



Regulation 19 Consultation Spreadsheet
Representations and Responses to the Castle Point Plan

Ordered by Surname E-H

January 2026

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/P ara No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a . So und?	3b. Positive/Effect ive/Justified/C onsistent?	3c. Explanation	4. Suggested modifications	5. Wis h to part icip ate in exam	6. Why ?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
00830001	Individual	Chrisine	Eagl estone		Not Stated	SP3	Not Stated	Not Stated	No	Justified, Consistent with National policy	I consider the Castlepoint Plan Regulation 19 draft to be unsound. It fails the test of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castlepoint and the site ignores Greenbelt/Greybelt against new NPPF guidelines. The plan needs amending, current plan allows for the over development of Castlepoint,especially Canvey Island, there is a lack of infrastructure, sewerage and drainage, along with flooding implications. Flooding, is of a concern due to be victims of surface water and sewage in 2014, [REDACTED] Also no mention of extra access on and off the Island.		No		No	A	It is not consistent with national policy, it doesn't meet the housing target for Castlepoint and the site ignores Greenbelt/Greybelt against new NPPF guidelines. The plan needs amending, current plan allows for the over development of Castlepoint,especially Canvey Island, there is a lack of infrastructure, sewerage and drainage, along with flooding implications. Flooding, is of a concern due to be victims of surface water and sewage in 2014, [REDACTED] Also no mention of extra access on and off the Island.	Objects that housing target not met, while also saying the current plan allows for the over development of Castlepoint, especially Canvey Island. Infrastructure Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Canvey Access The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy ' A Better Connected Essex' has set	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan	
1300001	Individual	Christine	Eagles			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.				Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for	Housing Supply – Government Housing Target and Standard method Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)	

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																	<p>Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led</p>	<p>Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.</p> <p><u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p><u>North-West Thundersley Northwest</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p>	

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																		Green Belt/Grey Belt Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
13010002	Individual	Christine	Eagles			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1300003	Individual	Christine	Eagles			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1194001	Individual	Stephen	Edgworth			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.				Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines	Housing Supply – Government Housing Target and Standard method Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)	

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								no credible five-year housing land supply.			3316 urban homes for Canvey is not resident led						state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability	

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																		Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
119400	Individual	Stephen	Edgeworth			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to	N

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02								Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.										the sites environment	
1194-0003	Individual	Stephen	Edworth			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0110-0001	Individual	Karen	Edwards		Yes	Whole Plan	Yes	Dear Sir/Madam I support the Castle Point Plan Regulation 19 Draft Consultation I consider the draft plan to be legally compliant I consider the draft plan to be sound I consent to my full name being published alongside my comments for this consultation.	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N
0885-0001	Individual	Jay	Edwards		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N

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0979001	Individual	Karen	Edwards		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
1036001	Individual	Allan	Edwards		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
1036002	Not Answered	Allan	Edwards		Not Answered	SD5	Yes		Yes		SD5 - Net Zero Carbon Development (Embodied Carbon) is sound. However, given the plan seeks to maximise the delivery of homes by increased urbanisation and hence in some cases use smaller sites there is a missed opportunity to seek a reduction in embodied carbon across the borough by applying the policy to smaller sites.	Expanding the scope of the SD5 - Net Zero Carbon Development (Embodied Carbon) policy to residential sites of greater than 24 homes and an appropriately smaller area of commercial space, would deliver greater sustainability across the borough.	No	Not Answered		A	Supports policy SD5 but identifies a missed opportunity in smaller sites so requests it be applicable to sites of 24 homes or more	Noted	N
1364001	Individual	Wendy	Edwards			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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13640002	Individual	Wendy	Edwards			SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			No five year housing land supply North West Thundersley should have been included Approach to Green/Grey Belt NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).	

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																		<p>common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West</p>	

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																		<p>Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by</p>	

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																		strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local	

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																		<p>highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to Canvey. SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS</p>	

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																		design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
13640003	Individual	Wendy	Edwards			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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07780001	Individual	Janet	Effeny		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible 5 year housing supply.	No	Justified, Consistent with national policy	The draft local plan is not justified with national policy. Doesn't meet the housing target for castle point. Greenbelt/Grey belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt built policy" Site selection is based on the overdevelopment brownfield sites. Not all sites considered. No greenbelt/grey belt sites added and with the exclusion Northwest Thundersley NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island unique geography and drainage infrastructure. The 3316 urban homes for Canvey is not resident led Canvey West homes puts residents in the East of Canvey at risk with emergency evacuation procedures.	Add North west Thundersley site. 187Ha Agreenbelt Grey belt brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200 with Canvey at 1050 Total housing target of 11000 homes.	No	Not Answered	Not Answered		Lack of Five Year Housing Land Supply Green/Grey Belt not considered North West Thundersley Flood Risk on Canvey Emergency Evacuation Concerns	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	N

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																		<p>common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>Green/Grey Belt</p>	

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																		<p>The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to;</p> <p>Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point,</p>	

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																		<p>Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August</p>	

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																		<p>2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Flooding on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management</p>	

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																		<p>infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/</p>	

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0600-0001	Individual	Ann	Eldridge		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped	N

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											evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.	Strategic alternatives North west	

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																		<p>Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p>Green/Grey Belt The Council has</p>	

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																		undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the	

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																		<p>impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergen</p>	

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																		<p>cyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation</p>	

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																		Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0600-0002	Individual	Ann	Eldridge		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing	N

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																		<p>commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025).</p> <p>Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt.</p> <p>That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the</p>	

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																		Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.		
06000003	Individual	Ann	Eldridge		Yes	Fore word					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.						A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N
137900	Individual	Ann	Eldridge			Hou 5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N	

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01											development which improves the overall site environment for the local residents.								
13790002	Individual	Ann	Eldridge			SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			No five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).	

I D R ef	Individual/ Organisatio n/Agent?	Firs t Na me	Last Nam e	If orga nisat ion - nam e	Has agreed to public ation of Name/ Comm ents?	Poli cy/P ara No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a . So und ?	3b. Positive/Effect ive/Justified/C onsistent?	3c. Explanation	4. Suggested modifications	5. Wis h to part icip ate in exa m	6. Why ?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																		land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic	

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																		<p>paper.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments</p>	

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																		guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of	

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																		<p>additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to Canvey. SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site</p>	

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																		circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
13790003	Individual	Ann	Eldridge			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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07640001	Individual	Elizabeth	Ellis		Yes	SP3	No	How on earth can a layman member of the public legitimately answer this question. I would refer to the comments of Rebecca Harris MP on the plan and do not believe that sufficient evidence of testing for legal tests of soundness and compliance are not demonstrable.	No	Positively prepared, Effective, Justified	I am not expert in public/national policy so cannot comment as to whether the plan presented is consistent with it. However I can say I see no evidence of objectively assessed needs in the plan. I do not see evidence of the consideration of proportionate alternatives and I do not believe the plan can and will be effectively delivered in the plan period. The housing sites for example are piecemeal and unlikely to achieve anywhere near the target figures. As a minor point the plan period needs to be clarified or amended it is non sensical to have 2023 as a start date.	Provision of evidence of objective assessments of all key matters, evidence of alternative proposals and approaches, proposed timescales for delivery which housing developments for example will be delivered in 5 years? 10 years? A most basic timeline could and should be provided for all elements.	No	Not Answered	Not Answered	A	No Evidence of alternative sites being considered Timescales of delivery not provided Not meeting housing targets Change the start date as 2023 is nonsensical	Alternative sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). Timescales of delivery Policy SP3 provides a timeline for the delivery of homes throughout the plan period. Not Meeting Housing Targets The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology.	N

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																		<p>However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point.</p> <p>The Castle Point Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025.</p> <p>Change the start date The start date</p>	

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																		has been ammended to 2026.	
07640002	Individual	Elizabeth	Ellis		Yes	SP3	No	I am not able to comment on legality this is a moot point. However the plan does not show evidence of consultation with neighbouring authorities.	No	Positively prepared, Effective, Justified, Consistent with national policy	Please also refer to previous comments regarding soundness. No evidence of objective assessment of needs. No evidence of alternatives No evidence of even the most basic timeline and therefore cannot be sure the plan can be effectively delivered within its timeline. How I assess whether it is consistent with national policy is totally unclear but I would again defer to Dame Rebecca Harris MP's formal response to the plan for details on this I fully support her response.		No	Not Answered		A	No evidence of DTC	DTC is addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. The Council has worked collaboratively with all to ensure that the Duty to Cooperate has been met.	N
084900	Individual	Diane	Ellis		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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01																				
0963-0001	Individual	Clive	Ellis		Yes	SP3	No	The council have failed to give fair consideration to strategic opportunities of the use of grey belt sites on the mainland in Benfleet / Thundersley under the NPPF Guide lines totally ignored the required numbers issued by the housing minister.	No	Positively prepared, Justified, Consistent with national policy	The NPPF clearly states that grey belt should be considered as part of the plan development to achieve the number of houses required, no true consideration of respecting these numbers requested have been considered as only just over half have been achieved The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. . The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt political stand point". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedure no further development of Canvey Island should take place until a 3rd access is completed.	We should aim for at least 70% of the required housing numbers as set out. a 3rd road scheme must be put in place for the Canvey's further development to absorb the additional 20 - 30% in the final years of this plan this gives time to act on the roads and infrastructure of Canvey enabling it to cope in the later part of the plan .	No	Not Answered	Not Answered	A	North West thundersley No five year housing land supply Not meeting housing target Green/Grey Belt Flood risk on canvey Infrastructure Third road onto Canvey	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point.	The Castle Point	N

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																		<p>Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025.</p> <p>Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the</p>	

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																		housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up	

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																		<p>delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West</p>	

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																		<p>Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the</p>	

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																		<p>value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development</p>	

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																		<p>site for those reasons set out above.</p> <p>Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA</p>	

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																		and IDP, including in relation to Canvey. Third Road onto Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the	

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																		Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	

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09850001	Individual	kim	ellis		Yes	SP3	No	Failed to consider strategic alternatives, like north west Thundersly, and certain greenbelt infill sites in and around Benfleet. No credible five year housing plan.	No	Justified, Consistent with national policy	The draft local plan is not consistent with the national policy. It does not meet the housing target for castle point. Site selection ignores Green/grey belt against NPPF guidelines. The local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt policy". Site selection is based on the "over development of brownfield sites." Not considered all sites, no greenbelt/greybelt sites added, with the exclusion of North West Thundersly. NPPF guidelines state development should be directed away from areas at high risk of flooding. SUDS measures are not appropriate for Canvey Islands unique geography and drainage infrastructure. The 3316 urban homes for Canvey is not resident led. Canvey west homes puts residents in the east at risk with emergency evacuation procedures.	Add north west thundersly, and certain strategic green/greybelt in fill sites in Benfleet Reduce the urban housing target to 3500 from 6200, with canvey Island at 1050.	No	Not Answered	Not Answered	A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Flood risk on Canvey Overdevelopment of brownfield sites	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes	N

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																		<p>provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025.</p> <p>Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan</p>	

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																		and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11	

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																		<p>onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport</p>	

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																		<p>evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle</p>	

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																		<p>Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out</p>	

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																		above. Flood risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in	

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																		relation to Canvey. Density The density for sites allocated within the plan has been informed by the Density and Capacity Study July 2025, please see this for further details.	

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12480001	Individual	Steve	Ellis			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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																		<p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u></p>		

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																		Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
12480002	Individual	Steve	Ellis			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
12	Individual	Steve	Ellis			C4					The number of Canvey West homes puts residents in the East						Development at West Canvey will impact	The safety of all Castle Point	N

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480003											at risk with emergency evacuation procedures.						emergency evacuation procedures for those residents living at East Canvey	residents is a priority and has been considered within the Castle Point Plan	
1249001	Individual	Jill	Ellis			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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																	urban homes for Canvey is not resident led	the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered	

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																		under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
12490002	Individual	Jill	Ellis			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								which improves the overall site environment for the local residents.											
12490003	Individual	Jill	Ellis			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
01070001	Individual	Tracey	Empson		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex

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											not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. Charfleets: Objects to inclusion of residential and lack of engagement,	processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDS: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the	and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		site to be used for these purposes	
0107-0002	Individual	Tracy	Empson		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0782-0001	Individual	Tracy	Empson		Yes	SP3	No	<p>FAILED TO CONSIDER STRATEGIC ALTERNATIVES FOR INSTANCE NORTH-WEST THUNDERSLEY NO CREDIBLE 5 YEAR HOUSING LAND SUPPLY</p> <p>ALSO I CANNOT SEE ANY EVIDENCE OF THE DRAINAGE BEING UPGRADED SINCE THE 2014 FLOODS WHEN THEY WERE DEEMED IN NEED OF UPGRADE</p> <p>I CANNOT SEE EVEDENCE OF FLOOD CHECKS IN WEST CANVEY SPECIFICALLY WHERE THE BULK OF HOUSING IS PLANNED</p>	No	Justified, Consistent with national policy	<p>THE DRAFT LOCAL PLAN IS NOT CONSISTENT WITH NATIONAL POLICY. IT DOESNT MEET THE HOUSING TARGET FOR CASTLE POINT.</p> <p>SITE SELECTION IGNORES GREENBELT/GREYBELT AGAINST NEW NPPF GUIDELINES</p> <p>THE DRAFT LOCAL PLAN IS NOT JUSTIFIED AND THE SITE SELECTION STRATERGY IS BIASED AND PREDETERMINED TOWARDS A 'NO GREENBELT BUILD POLICY'.</p> <p>SITE SELECTION IS BASED ON THE 'OVER DEVELOPMENT OF BROWNFIELD SITES NOT CONSIDERED ALL SITES - NO GREENBELT/GREYBELT SITES ADDED WITH THE EXCLUSION OF NORTH WEST THUNDERSLEY. NPPF GUIDELINES STATE DEVELOPMENT SHOULD BE DIRECTED AWAY FROM AREAS AT HIGHEST RISK OF FLOODING. SUDS MEASURES ARE NOT APPROPRIATE FOR CANVEY ISLANDS UNIQUE GEOGRAPHY</p>	<p>DRAFT DOCUMENT NEEDS TO BE LEGALLY COMPLAINT AND/OR SOUND INCLUDING ANY REVISED WORDING.</p> <p>ADD NORTH WEST THUNDERSLEY SITE 187Ha, A GREENBELT/GREYBELT/BROWNFIELD SITE OPTION FOR 7,500 HOMES REDUCE THE URBAN HOUSING TARGET TO 3,500 FROM 6,200 WITH CANVEY AT 1,050</p> <p>TOTAL</p>	No	Not Answered	Not Answered	A	Lack of Five Year Housing Land Supply Green/Grey Belt not considered North West Thundersley Flood Risk on Canvey Emergency Evacuation Concerns	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The	N

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											AND DRAINAGE INFRASTRUCTURE. THE 3316 URBAN HOMES FOR CANVEY IS NOT RESIDENT LED. CANVEY WEST HOMES PUTS RESIDENTS IN THE EAST AT RISK WITH EMERGENCY EVACUATION PROCEDURES.	HOUSING TARGET 11,000						five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery	

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																		<p>rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the</p>	

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																		<p>value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those</p>	

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																		<p>reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Flooding on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of</p>	

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																		<p>development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/</p>	

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07830001	Individual	TONY	Empson		Yes	SP3	No	FAILED TO CONSIDER STRATEGIC ALTERNATIVES FOR INSTANCE NORTH-WEST THUNDERSLEY NO CREDIBLE 5 YEAR HOUSING LAND SUPPLY ALSO I CANNOT SEE ANY EVIDENCE OF THE DRAINAGE BEING UPGRADED SINCE THE 2014 FLOODS WHEN THEY WERE DEEMED IN NEED OF UPGRADE I CANNOT SEE EVIDENCE OF FLOOD CHECKS IN WEST CANVEY SPECIFICALLY WHERE THE BULK OF HOUSING IS PLANNED	No	Justified, Consistent with national policy	THE DRAFT LOCAL PLAN IS NOT CONSISTENT WITH NATIONAL POLICY. IT DOESNT MEET THE HOUSING TARGET FOR CASTLE POINT. SITE SELECTION IGNORES GREENBELT/GREYBELT AGAINST NEW NPPF GUIDELINES THE DRAFT LOCAL PLAN IS NOT JUSTIFIED AND THE SITE SELECTION STRATEGY IS BIASED AND PREDETERMINED TOWARDS A 'NO GREENBELT BUILD POLICY'. SITE SELECTION IS BASED ON THE 'OVER DEVELOPMENT OF BROWNFIELD SITES NOT CONSIDERED ALL SITES - NO GREENBELT/GREYBELT SITES ADDED WITH THE EXCLUSION OF NORTH WEST THUNDERSLEY. NPPF GUIDELINES STATE DEVELOPMENT SHOULD BE DIRECTED AWAY FROM AREAS AT HIGHEST RISK OF FLOODING. SUDS MEASURES ARE NOT APPROPRIATE FOR CANVEY ISLANDS UNIQUE GEOGRAPHY AND DRAINAGE INFRASTRUCTURE. THE 3316 URBAN HOMES FOR CANVEY IS NOT RESIDENT LED. CANVEY WEST HOMES PUTS RESIDENTS IN THE EAST AT RISK WITH EMERGENCY EVACUATION PROCEDURES.	DRAFT DOCUMENT NEEDS TO BE LEGALLY COMPLAINT AND/OR SOUND INCLUDING ANY REVISED WORDING. ADD NORTH WEST THUNDERSLEY SITE 187Ha, A GREENBELT/GREYBELT/BROWNFIELD SITE OPTION FOR 7,500 HOMES REDUCE THE URBAN HOUSING TARGET TO 3,500 FROM 6,200 WITH CANVEY AT 1,050 TOTAL HOUSING TARGET 11,000	No	Not Answered	Not Answered	A	Lack of Five Year Housing Land Supply Green/Grey Belt not considered North West Thundersley Flood Risk on Canvey Emergency Evacuation Concerns	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	N

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																		<p>common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>Green/Grey Belt</p>	

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																		<p>The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to;</p> <p>Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point,</p>	

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																		<p>Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August</p>	

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																		<p>2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Flooding on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management</p>	

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																		<p>infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/</p>	

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0310001	Individual	Martin	England		Yes	SP3	No	The draft plan is not legally compliant as it fails to consider strategic alternatives, like North West Thundersley, which has been excluded, the biodiversity and environmental protection needs strengthening, there is no credible five-year housing land supply and a lack of evidence on cross-boundary infrastructure with a duty to cooperate. The policy of not building on the Greenbelt is biased and predetermined. You only need to examine the credentials of the local plan board councillors to realise the biased ideology they have brought to this local plan process. The obviously contrived error in the Reg 19 local plan consultation, having to opened the process up again, is legally incompetent, with no justification except a politically motivated manipulation of the results, which needs investigating.	No	Justified, consistent with national policy	It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Add the Greenbelt / Grey Belt sites of Kings Park HO31. Add the Greenbelt site of Land East of Manor Trading S0145 SHLAA 2018. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, Benfleet at 347, Thundersley at 643, and Hadleigh at 305, keeping Existing Commitments 480, and Windfall Allowance 675. Total housing target of 11,000 Dredge Canvey Lake Revise Had4 Scrub Lane development to 20 homes. Remove the	Yes	As Head of the Save Hadleigh Farmland Group I would like to put the case forward as to why our site is still at risk with a local plan that will be found unsound, which will then lead	No	A	Fails to consider strategic alternatives, like North West Thundersley. Infrastructure Delivery Plan has not identified the infrastructure required to meet the demands of new development in NW Thundersley. The Council have made no attempt to work positively with developers and landowners, neighbouring authorities, Essex County Council, and infrastructure providers throughout the planning process to consider the viability of NW Thundersley The biodiversity and environmental protection needs strengthening. There is no credible five-year housing land supply, nor does it meet the housing target for Castle Point. Lack of evidence on cross-boundary infrastructure with a duty to cooperate. The policy of not building on the Greenbelt is biased and predetermined. Greenbelt sites need total protection from government intervention.	<u>Duty to Cooperate</u> addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West	N

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											Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. The Reg 19 Local Plan Consultation document, published in July 2025 does not comply with the IDP document issued in May 2025. For example, the IPD document states 1000 homes max for Canvey West, but two months later that has been increased to 2700 homes, without any evidence. The IPD document states 80 homes for Scrub Lane, but two months later that has been increased to 114 homes, without any evidence. This was never resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. The Councils proposal for 6,196 homes on Brownfield only is urban destruction, and unsustainable. The Borough already has major issues where the roads are gridlocked, with traffic lights, road works, water pipe leaks, sewage system failure, gas pipe leaking, powers surges, flooding, drainage blocked, the doctors are full, there are no dentists, no school places, and the residents complain constantly. This needs to be addressed with a new site to be considered in North West Thundersley. Adding the North West Thundersley site as an	Had3 Hadleigh Clinic site from the local plan Remove Manor Trading Industrial Estate site from the plan. Remove Charfleets Industrial Estate site from the plan. Remove the Thun3A Thundersley Clinic site from the local plan		to speculative development across our precious Greenbelt sites. Also, the over development with this plan will cause untold issues to the local urban areas, when there are viabl		The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Add the Greenbelt / Grey Belt sites of Kings Park HO31. Add the Greenbelt site of Land East of Manor Trading S0145 SHLAA 2018. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, Benfleet at 347, Thundersley at 643, and Hadleigh at 305, keeping Existing Commitments 480, and Windfall Allowance 675. Total housing target of 11,000	Thundersley was not preferred. <u>Housing Numbers</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply:</u> See housing topic paper. Plan		

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											<p>alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites. The DAC Planning Grey Belt document states the North West Thundersley site is not viable, but they were told by officers in the council to add a note "not to consider" North West Thundersley. There were also two NWT Dove Reports published on the Council's own website, with maps and plans for NWT, but they have mysteriously been removed from the website recently. This makes the removal of evidence worse than the lack of evidence.</p> <p>There is no justifiable reason to not consider North West Thundersley.</p>			e sites available which have not been seriously considered, like NW Thundersley. Also, as a Committee Member for the Friends of Canvey Lake group I would like to put the case				to provide for rolling 5 year housing land supply <u>Green Belt/Grey belt</u> covered under policy GB2. The Green Belt Assessment July 2025 reviewed all potential sites within Castle Point's Green Belt, these sites were then considered against further criteria including: environmental and heritage designations, flood risk, highways issues which impact viability, sustainability as well as having regard for the Essex LNRS and strategic opportunity areas for biodiversity improvements. Any potential grey belt sites identified within the Green Belt Assessment July 2025, were reviewed. However, none were considered suitable for	

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														forward as to why our lake is still at risk with this plan that puts over three thousand houses on Canvey Island, but when found unsound, will lead to speculative development				development as outlined in the Housing Capacity Topic Paper August 2025. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>Highways Impacts</u> The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions.	

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														across our precious Greenbelt sites, with the additional houses on our Grey Belt sites on Canvey, when there are viable sites available which have not been seriously considered,					

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0310002	Individual	Martin	England		Yes	Had 2	No		No	Justified, consistent with national policy	<p>It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.</p> <p>It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified.</p> <p>The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack</p>		Yes	As Head of the Save Hadleigh Farmland Group I would like to put the case forward as to why our site is still at risk with a local plan that will be found unsound, which will then lead	No	A	<p>Had2, for the Hadleigh Farm area needs protection as an open space, promoting the heritage value with the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt.</p> <p>We need a C6 Policy (Green lung) for this farmland, the South Hadleigh Green Lung + protection as Local Green Space.</p> <p>Agricultural land: As stated in the agricultural land document date June 2025, just over twenty-one percent of Castle Point's land is in agricultural use, and the remaining agricultural areas in the Castle Point are increasingly fragile but contribute greatly to the Borough's character and will be important to preserve. Also, given that the purpose of preservation is long-term food security, the benefit of preserving agricultural land applies regardless. Once the graded agricultural land is lost to development, it is lost forever.</p>	Policy Had2 comments noted Agricultural Land See Policy ENV6 and supporting evidence 'Agricultural Land in Castle Point' (June 2025)	N

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											<p>of infrastructure, sewage and drainage, and flooding implications. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites.</p> <p>I do totally agree with the policy Had2, for the Hadleigh Farm area, which talks about this site as environmental, recreational, nature recovery (LNRS), biodiversity (APIBs), agricultural, farming activities, nature conservation, Site of Specific Scientific Interest, Ramsar site, East Coast Flyway World Heritage site, ecological restoration, habitat creation, and connectivity. This site needs protection as an open space, promoting the heritage value with the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt.</p> <p>I concur that the Had2 policy is about protecting this greenbelt site as not suitable for development, with respect to urban sprawl, it is a buffer zone, the effect on the highways and traffic, the lack of infrastructure, protecting our farmland, protecting the wildlife, out of character, open space, heritage, archaeology, promoting the historic links, and that we should use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on</p>			to speculative development across our precious Greenbelt sites. Also, the over development with this plan will cause untold issues to the local urban areas, when there are viabl										

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											<p>Sea. This is confirmed by the Housing Capacity Topic Paper - August 2025, which confirms sites GB8 A&B are not Potential Grey Belt, with that the complete site or sub-areas are not recommended for further consideration. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. The Salvation Army and their developers should be told in no uncertain terms that this farmland is not for development ever.</p> <p>We need a C6 Policy for this farmland, the South Hadleigh Green Lung. The south Hadleigh Green Lung will be protected and enhanced as a strategic green infrastructure asset between Hadleigh and Leigh on Sea. Its key role will be connecting ecological networks, protecting its ecological value, provide a strategically important ecological corridor, securing a high level of biodiversity net gain, have no adverse impact on the integrity of nearby habitats sites, support the creation of new habitats, through Biodiversity Net Gain, Countryside Stewardship, to support the habitat priority measures, with the nature recovery strategy and as an area of particular Importance for Biodiversity. The Plan's approach to biodiversity and environmental protection needs strengthening and developments should not proceed where it results in significant harm to biodiversity or</p>			e sites available which have not been seriously considered, like NW Thundersley. Also, as a Committee Member for the Friends of Canvey Lake group I would like to put the case									

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											<p>protected sites unless that harm can be fully mitigated.</p> <p>As stated in the agricultural land document date June 2025, just over twenty-one percent of Castle Point's land is in agricultural use, and the remaining agricultural areas in the Castle Point are increasingly fragile but contribute greatly to the Borough's character and will be important to preserve. Also, given that the purpose of preservation is long-term food security, the benefit of preserving agricultural land applies regardless. Once the graded agricultural land is lost to development, it is lost forever.</p> <p>This complete site should be included for neighbourhood plans and local green space designation. This is based on the listed assets of community value, visitors, conservation areas, registered historic site, local nature reserve, Sites of Special Scientific Interest, footpaths and cycle routes, country parks, rural footpaths and nature trails, and public rights of way. This site has areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance.</p> <p>I can fully support this policy Had2 with no housing development ever on this farmland site, but an unsound plan makes this site a high risk. Adding the North West</p>			forward as to why our lake is still at risk with this plan that puts over three thousand houses on Canvey Island, but when found unsound, will lead to speculative development										

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											<p>Thundersley site as an alternative has been consistently dismissed by councillors, on social media, and their own website, without foundation, as a scheme for road access was positively discussed by CPBC, ECC and Basildon Council many years ago, see attached photo. Our councillors say it is not viable, but they have not proposed any plan for this site for ECC to review and object to.</p> <p>As a campaign, the Save Hadleigh Farmland Group have their own views and opinions, which have been constantly abused by councillors on social media, to discredit me and the campaign, which continued during the consultation process, even into the last week. The SHF campaign group held a social event, at 2.15pm on Saturday 20th September, to discuss various points including the local plan consultation, and residents were intimidated by three PIP councillors that turned up outside, in an attempt to discredit our opinions, who were handing out their own leaflets was a blatant attempt to undermine public participation in the consultation, to deter residents from providing their views and engaging in the consultation process, thus weakening the plan's justification and effectiveness, see attached photos. This means they only want responses from the community that they approve of and their own leaflet was a fabricated biased view of</p>			across our precious Greenbelt sites, with the additional houses on our Grey Belt sites on Canvey, where there are viable sites available which have not been seriously considered,										

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											political ideology, with predetermination set in most paragraphs, if you accept one piece of Greenbelt, you accept them all, and political parties and councillors are fully entitled to have views, which is predisposition, but when that agenda and those views affect your decisions making process it is predetermination, see the leaflet attached. This should be investigated by the inspector.			like NW Thundersley.						

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0310003	Individual	Martin	England		Yes	Had 4	No		No	Justified, consistent with national policy	<p>It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.</p> <p>It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified.</p> <p>The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack</p>		Yes	As Head of the Save Hadleigh Farmland Group I would like to put the case forward as to why our site is still at risk with a local plan that will be found unsound, which will then lead	No	A	Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character	<p>Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation.</p> <p>Parking Capacity Any application for homes on this site will have to comply with policy T7 which requires the EPOA Parking Guidance (Part 1 and 2) to be implemented.</p> <p>Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.</p>	N

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											<p>of infrastructure, sewage and drainage, and flooding implications. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites.</p> <p>The Had4 Policy is a perfect example of the over development urban policy, with an unrealistic proposal for 114 homes, using the Castle Point Density and Capacity Study, and a 100dph urban guide, in a residential area of housing currently having homes at 20dph. Housing on this site at 100dph would equate to six blocks of flats, four flats per floor, and four stories high, which is out of character for the area. The statement that the frontage of the development is designed to reflect the character of Scrub Lane, is a complete fabrication, as the houses opposite relates to approx. 15dph and it will never match the current street scene. The addition of 114 homes, and over 200 cars, would cause major issues at the Scrub Lane / Rectory Rod traffic lights. This resident led local plan said protect the Greenbelt and use the Brownfield sites, but the resident's responses did not say to destroy those areas like Scrub Lane with over development. This policy is the perfect reason why you need to add the North West Thundersley site as an alternative site, that gives us the housing numbers required, driven by an infrastructure first policy and we can reduce the</p>			to speculative development across our precious Greenbelt sites. Also, the over development with this plan will cause untold issues to the local urban areas, when there are viabl									

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											over development of our urban sites across the borough.			e sites available which have not been seriously considered, like NW Thundersley. Also, as a Committee Member for the Friends of Canvey Lake group I would like to put the case					

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														forward as to why our lake is still at risk with this plan that puts over three thousand houses on Canvey Island, but when found unsound, will lead to speculative development					

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														across our precious Greenbelt sites, with the additional houses on our Grey Belt sites on Canvey, when there are viable sites available which have not been seriously considered,					

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														like NW Thundersley.					
0310004	Individual	Martin	England		Yes	Had 3			No	Justified, consistent with national policy	<p>It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.</p> <p>It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and</p>		Yes	As Head of the Save Hadleigh Farmland Group I would like to put the case forward as to why our site is still at	No	A	Remove the Had3 Hadleigh Clinic site from the local plan	Noted	N

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											<p>the gap has not been robustly justified.</p> <p>The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites.</p> <p>The Had3 Policy is a perfect example of the over development urban policy, with an unrealistic and unwanted proposal for 14 homes. The Hadleigh Clinic is used by many local elderly residents from Hadleigh, who have no transport available, who walk to these clinics, and there will be no local alternative provided elsewhere nearby. The levels of health service provision must be maintained or improved with a local health hub but not removed. There is no justification to close this clinic, to re-provide the same service elsewhere in the Hadleigh area, and we have no local health hub. This local</p>			risk with a local plan that will be found unsound, which will then lead to speculative development across our precious Greenbelt sites. Also, the over development with this plan					

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											plan is just picking ludicrous sites to fulfil its urban brownfield only site selection policy, which unbelievably used AI for that site selection. With reference to Policy Infra3, Improving Health and Wellbeing, paragraph 19.41 states, there are currently four community clinics in Castle Point, so with the Had3 & Thun3A policies these will be reduced by 50% and paragraph 19.42 states, there is currently a deficit in GP practice space in Castle Point. and as new residential development is permitted, new healthcare space is required, which contradicts the Had3 & Thun3A policies.			will cause untold issues to the local urban areas, when there are viable sites available which have not been seriously considered, like NW Thundersley. Also, as a Committee					

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														member for the Friends of Canvey Lake group I would like to put the case forward as to why our lake is still at risk with this plan that puts over three thousand houses on Canvey Island,					

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														but when founded unsound, will lead to speculative development across our precious Greenbelt sites, with the additional houses on our Grey Belt sites on Canvey, when ther					

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														are viable sites available which have not been seriously considered, like NW Thundersley.					

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0310005	Individual	Martin	England		Yes	C7		CPBC Plan Page 46+J559 4.01 Extract from the 6-Point Plan for Canvey Island, concerning Canvey Lake. "The Section 19 F+J559	No	Justified, consistent with national policy	<p>It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.</p> <p>It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.</p> <p>The plan needs amending as this unsound plan, for 6,200 homes,</p>		Yes	As Head of the Save Hadleigh Farmland Group I would like to put the case forward as to why our site is still at risk with a local plan that will be found unsound, which will then lead	No	A	<p>Dredge Canvey Lake Policy C7 Agrees with improving the Canvey Lake area being master planned as a multi-functional well-used green space.</p> <p>Development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications.</p>	<p>Policy C7 comments noted <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDS Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.</p>	<p>Y - Policy SD3(3)</p> <p>'Proposals must demonstrate how the SuDS feature(s) reflect and respond to the constraints of the specific geographic location, site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex, the Castle Point Strategic Flood Risk</p>

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											<p>will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites.</p> <p>I do agree with Policy C7 about improving the Canvey Lake area and will be master planned as a multi-functional well-used green space. This will deliver an increased capacity of the Lake from dredging for flood water storage (attenuation area), reducing flood risk to those living on the periphery of the lake, a long-term management plan of the lake to ensure the flood mitigation remains effective, improvements to water quality, a long-term management plan to maintain high quality water standards, enhancements to the habitat surrounding the lake, an environment to create an attractive and functional area, and also identified as an area of particular importance for biodiversity within the Essex Local Nature Recovery Strategy</p>			to speculative development across our precious Greenbelt sites. Also, the over development with this plan will cause untold issues to the local urban areas, when there are viabl										Assessment (SFRA) and recommendations/ advice from statutory bodies (including EA, Essex LLFA).'

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											<p>which is protected and where possible enhanced.</p> <p>I concur with the many statements made within this policy, that Canvey Island suffers from high levels of surface water flood risk, and during times of higher rainfall Canvey Lake becomes an important depository for excess rainwater, that poor water quality is unsafe for users, animals and biodiversity to thrive, we need to further improve the natural environment in this area and achieve the best outcomes for the natural environment, and that further work should be undertaken into the functionality of the lake and how water quality, with surface water runoff contaminates, should be managed and maintained in the future, that the Canvey Island 6 Point Plan was undertaken in 2015, which identified Canvey Lake as an important asset in managing flood water on the Island, particularly during storm events, and recommended that the capacity of the lake should be investigated, addressed, and achieved through dredging and re-profiling the banks of the lake to provide additional storage capacity, with planned regular maintenance, which would provide huge benefits for the surrounding homes, which are impacted by flooding in this area, and that Canvey Lake acts as a habitat to many different wildlife, including waterbirds and some aquatic life, there are risks to wildlife due to the water quality,</p>			e sites available which have not been seriously considered, like NW Thundersley. Also, as a Committee Member for the Friends of Canvey Lake group I would like to put the case								

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											however, there are huge opportunities to improve this through management of the water and to enhance wildlife through creation of new and improved habitats. This is the vision we need for Canvey Lake.			forward as to why our lake is still at risk with this plan that puts over three thousand houses on Canvey Island, but when found unsound, will lead to speculative development					

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														across our precious Greenbelt sites, with the additional houses on our Grey Belt sites on Canvey, when there are viable sites available which have not been seriously considered,					

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														like NW Thunders ley.					
0310006	Individual	Martin	England		Yes	Hou5			No	Justified, consistent with national policy	<p>It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.</p> <p>It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and</p>		Yes	As Head of the Save Hadleigh Farmland Group I would like to put the case forward	No	A	<p>Policy Hou5: Concentrations of older people increases pressure on health services but HO31 could offer a doctor's surgery as part of the S106 agreement. All our homes are robust, make provision for cold weather and risk from flooding. The Hou5 Policy states, that the siting of most park homes on the existing sites will not require new planning consent as their provision is permitted under the existing consents for</p>	Park Homes and Pressures on Health Services Noted.	N

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											<p>the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures, and there is no emergency evacuation procedure for Canvey Island.</p> <p>The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can</p>			as to why our site is still at risk with a local plan that will be found unsound, which will then lead to speculative development across our precious Greenbelt sites. Also, the over		the use of the site as a caravan park. We can fully support a policy that adds homes to the local plan, in the right place, but the Hou5 Policy should allow further development which improves the overall site environment for the residents. The local plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different.			

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											<p>reduce the over development of our urban sites.</p> <p>The Hou5 Policy states, new park homes will only be supported on existing Park Home sites, and concentrations of older people increases pressure on health services but HO31 could offer a doctor's surgery as part of the S106 agreement. All our homes are robust, make provision for cold weather and risk from flooding. The Hou5 Policy states, that the siting of most park homes on the existing sites will not require new planning consent as their provision is permitted under the existing consents for the use of the site as a caravan park. We can fully support a policy that adds homes to the local plan, in the right place, but the Hou5 Policy should allow further development which improves the overall site environment for the residents. The local plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different.</p>			development with this plan will cause untold issues to the local urban areas, when there are viable sites available which have not been seriously considered, like NW Thundersley.								

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														houses on Canvey Island, but when founded, will lead to speculative development across our precious Greenbelt sites, with the additional houses on our Grey Belt					

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														sites on Canvey, when there are viable sites available which have not been seriously considered, like NW Thundersley.					

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0310007	Individual	Martin	England		Yes	B8			No	Justified, consistent with national policy	<p>It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.</p> <p>It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified.</p> <p>The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack</p>		Yes	As Head of the Save Hadleigh Farmland Group I would like to put the case forward as to why our site is still at risk with a local plan that will be found unsound, which will then lead	No	A	Policy B8 Manor Trading Estates (MTE) inclusion as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties.	Manor Trading Estate: Policy B8 part 6 states 'A programme of renewal of the industrial and commercial building stock within the estate with the overall aim of an increase in floor space of at least 10%' Paragraph 9.28 states 'It is not the intention of the Master Plan to result in a loss of employment on this site. Overall, the Master Plan should seek a modest increase in the floor space available for industrial and commercial uses to support economic growth. This will be secured through the revised approach to design and parking.'	N

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											<p>of infrastructure, sewage and drainage, and flooding implications. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites.</p> <p>The inclusion of the Manor Trading Estate (MTE) as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties.</p> <p>This B8 policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on MTE. The B8 Policy for MTE will result in restricted economic growth, reduction in protected employment area, unemployment, force business to move to Canvey, and housing over employment is not an option. This policy is not evidence based, but records</p>			to speculative development across our precious Greenbelt sites. Also, the over development with this plan will cause untold issues to the local urban areas, when there are viabl										

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											show poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on the MTE. CPBC vision is to create an environment that promotes business on MTE, by removing a 25% of its employment space for housing. This vision will mean MTE businesses will be forced to move to Canvey employment zones, as previously suggested that any increase in commercial / industrial area could be accommodated on Canvey. ECC will relay objections in that any residential units near protected facilities will undoubtedly increase noise complaints. CPBC's Officers Mapping area the MTE is incorrect and misleads the public, as MTE is a max of 12.5 Ha and not the 14 Ha stated, as it does not include the properties which all front Church Road. The MTE Road & footways network is privately owned, so who will fund the new roads, footways, and cycle paths across private land. The future plans for Manor Trading Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Manor Trading Industrial estate for housing, with business integrated with residential homes.			e sites available which have not been seriously considered, like NW Thundersley. Also, as a Committee Member for the Friends of Canvey Lake group I would like to put the case							

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														forward as to why our lake is still at risk with this plan that puts over three thousand houses on Canvey Island, but when found unsound, will lead to speculative development					

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														across our precious Greenbelt sites, with the additional houses on our Grey Belt sites on Canvey, when there are viable sites available which have not been seriously considered,					

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														like NW Thundersley.					
03100008	Individual	Martin	England		Yes	C4			No	Justified, consistent with national policy	<p>It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.</p> <p>It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West</p>		Yes	As Head of the Save Hadleigh Farmland Group I would like to put the case forward as to	No	A	Charfleets Industrial estate: No reasoned justification for using the Charfleets Industrial estate for housing, with business integrated with residential homes. Remove Manor Trading Industrial Estate site from the plan. Remove Charfleets Industrial Estate site from the plan.	Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used	N

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											<p>Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.</p> <p>The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites.</p>			why our site is still at risk with a local plan that will be found unsound, which will then lead to speculative development across our precious Greenbelt sites. Also, the over deve									for these purposes.	

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											The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority on the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with business integrated with residential homes.			lop ment with this plan will cause untold issues to the local urban areas, when there are viable sites available which have not been seriously considered, like NW Thundersley. Also								

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														ses on Canvey Island, but when found unsound, will lead to speculative development across our precious Greenbelt sites, with the additional houses on our Grey Belt sites					

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														on Canvey, when there are viable sites available which have not been seriously considered, like NW Thundersley.					

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03100009	Individual	Martin	England		Yes	SP3			No	Justified, consistent with national policy	<p>It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.</p> <p>It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.</p> <p>The plan needs amending as this unsound plan, for 6,200 homes,</p>		Yes	As Head of the Save Hadleigh Farmland Group I would like to put the case forward as to why our site is still at risk with a local plan that will be found unsound, which will then lead	No	A	Essentially the same points as made in Rep 0310-001 above by the same respondent on Policy SP3	Essentially the same responses made to Rep 0310-001 above by the same respondent on Policy SP3	N

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											<p>will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites.</p> <p>The Infrastructure Delivery Plan has not identified the infrastructure required to meet the demands of new development in NW Thundersley. The Council have made no contributions towards the provision of infrastructure required to make a development proposal acceptable in planning terms for NW Thundersley. The Council have made no attempt to work positively with developers and landowners, neighbouring authorities, Essex County Council, and infrastructure providers throughout the planning process to consider the viability of NW Thundersley. The Council will also have regard to Essex County Council's (ECC) Developers' Guide to Infrastructure Contributions. ECC play an important role as an</p>			to speculative development across our precious Greenbelt sites. Also, the over development with this plan will cause untold issues to the local urban areas, when there are viabl					

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											<p>infrastructure provider in Castle Point. The IDP fail to address the infrastructure needs to meet the growth within the Borough, with a development on the scale of NW Thundersley.</p> <p>ECC have had no plan to review over the NW Thundersley, and the council continue to categorically state that access from the A130 is not viable, and Essex County Council refuse to permit an access to the A130 but plans show a scheme was positively discussed by CPBC, ECC and Basildon Council many years ago, but this has been ignored, see attached photo. This scheme shows what can be achieved with dialogue, the intention to progress positively and working in partnership. The ECC website states, in their Development Management Policy, all proposals are assessed and determined in relation to the Development Management Route Hierarchy Policies, where vehicular access is accepted in principle, the number of access points will be kept to a minimum and new access points will be designed and constructed in accordance with the current standards, where existing access is to be used substandard accesses will be improved and/or upgraded in accordance with the current standards for the category of road, and all proposals are assessed and determined against current standards for the category of road having regard to the capacity, safety and</p>			e sites available which have not been seriously considered, like NW Thundersley. Also, as a Committee Member for the Friends of Canvey Lake group I would like to put the case									

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											geometry of the highway network. The NW Thundersley site should be added as an alternative, with 50% of the area on the call for sites and 50% of the area is grey belt factoring in PDL, but not one site has been added to the local plan.			forward as to why our lake is still at risk with this plan that puts over three thousand houses on Canvey Island, but when found unsound, will lead to speculative development						

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														across our precious Greenbelt sites, with the additional houses on our Grey Belt sites on Canvey, when there are viable sites available which have not been seriously considered,					

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														like NW Thundersley.					
0310010	Individual	Martin	England		Yes	Thun 3A			No	Justified, consistent with national policy	<p>It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.</p> <p>It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and</p>		Yes	As Head of the Save Hadleigh Farmland Group I would like to put the case forward	No	A	Objecting to THUN3 because: Accessible clinic should not be removed	Policy THUN3 required the NHS to provide assurance that the site is surplus to requirements and that the services can be provided elsewhere nearby.	N

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											<p>the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified.</p> <p>The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites.</p> <p>The Thun3A Policy is a perfect example of the over development urban policy, with an unrealistic and unwanted proposal for 24 homes. The Thundersley Clinic is used by many local elderly residents from Thundersley, who have no transport available, who walk to these clinics, and there will be no local alternative provided elsewhere nearby. The levels of health service provision</p>			as to why our site is still at risk with a local plan that will be found unsound, which will then lead to speculative development across our precious Greenbelt sites. Also, the over									

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											<p>must be maintained or improved with a local health hub but not removed. There is no justification to close this clinic, to re-provide the same service elsewhere in the Thundersley area, and we have no local health hub. This local plan is just picking ludicrous sites to fulfil its over development urban brownfield only site selection policy, which unbelievably used AI for that site selection. With reference to Policy Infra3, Improving Health and Wellbeing, paragraph 19.41 states, there are currently four community clinics in Castle Point, so with the Had3 & Thun3A policies these will be reduced by 50% and paragraph 19.42 states, there is currently a deficit in GP practice space in Castle Point. and as new residential development is permitted, new healthcare space is required, which contradicts the Had3 & Thun3A policies.</p>			development with this plan will cause untold issues to the local urban areas, when there are viable sites available which have not been seriously considered, like NW Thundersley.								

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														Also, as a Committee Member for the Friends of Canvey Lake group I would like to put the case forward as to why our lake is still at risk with this plan that puts over three thousand					

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														houses on Canvey Island, but when founded, will lead to speculative development across our precious Greenbelt sites, with the additional houses on our Grey Belt					

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0951-0001	Individual	Margaret	England		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	<p>It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.</p> <p>It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site.</p> <p>I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt.</p> <p>I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of</p>	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered	A	<p>Not meeting housing target</p> <p>No five year housing land supply</p> <p>North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh</p>	<p>Housing Need</p> <p>The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology.</p> <p>However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point.</p> <p>The Castle Point Plan Regulation 19 Draft makes</p>	N

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											<p>infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction.</p> <p>We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.</p>										<p>provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025.</p> <p>Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan</p>	

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																		and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11	

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																		<p>onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport</p>	

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																		<p>evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle</p>	

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																		<p>Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out</p>	

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09520001	Individual	John	England		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	<p>It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.</p> <p>It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site.</p> <p>I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt.</p> <p>I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of</p>	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered	A	<p>Not meeting housing target</p> <p>No five year housing land supply</p> <p>North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh</p>	<p>Housing Need</p> <p>The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology.</p> <p>However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point.</p> <p>The Castle Point Plan Regulation 19 Draft makes</p>	N

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											<p>infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction.</p> <p>We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.</p>										<p>provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025.</p> <p>Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan</p>	

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0959-0001	Individual	Sophie	England		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	<p>It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.</p> <p>It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site.</p> <p>I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt.</p> <p>I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of</p>	<p>Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes.</p> <p>Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305.</p> <p>Total housing target of 11,000.</p>	No	Not Answered	Not Answered	A	<p>Not meeting housing target</p> <p>No five year housing land supply</p> <p>North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh</p>	<p>Housing Need</p> <p>The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology.</p> <p>However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point.</p> <p>The Castle Point Plan Regulation 19 Draft makes</p>	N

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											<p>infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction.</p> <p>We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.</p>											<p>provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025.</p> <p>Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan</p>	

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																		<p>Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out</p>	

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0959-0002	Individual	Sophie	England		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Effective, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at	No	Not Answered		A	Overdevelopment of brownfield sites North West Thundersley	Density The density for sites allocated within the plan has been informed by the Density and Capacity Study July 2025, please see this for further details. North West Thundersley	N

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											<p>Belt sites added, and the exclusion of the North West Thundersley site.</p> <p>The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites.</p>	<p>1050, Hadleigh at 305.</p> <p>Total housing target of 11,000.</p>									<p>North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p>	

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0966-0001	Individual	Matthew	Engl and		Yes	HAD 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	<p>It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.</p> <p>It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site.</p> <p>I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt.</p> <p>I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of</p>	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered		<p>Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh</p> <p>Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology.</p> <p>However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point.</p> <p>The Castle Point Plan Regulation 19 Draft makes</p>	N	

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											<p>infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction.</p> <p>We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.</p>											<p>provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025.</p> <p>Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan</p>	

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																		<p>evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle</p>	

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096-0002	Individual	Matthew	England		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	<p>It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.</p> <p>It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.</p> <p>The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect</p>	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No	Not Answered			<p>Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Flood risk on Canvey Overdevelopment of brownfield sites</p>	<p>Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology.</p> <p>However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point.</p> <p>The Castle Point Plan Regulation 19 Draft makes</p>	N

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																		above. Flood risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in	

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																		relation to Canvey. Density The density for sites allocated within the plan has been informed by the Density and Capacity Study July 2025, please see this for further details.	
096-0003	Individual	Matthew	England		Yes	HAD 4	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Revise Scrub Lane development to 20 homes. Reduce the Urban Housing target to 3500 from 6200, with	No	Not Answered			Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure	N

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											<p>Belt sites added, and the exclusion of the North West Thundersley site.</p> <p>The Had4 Policy is a perfect example of the over development urban policy, with an unrealistic proposal for 114 homes, using the Castle Point Density and Capacity Study, and a 100dph urban guide, in a residential area of housing currently having homes at 20dph. Housing on this site at 100dph would equate to six blocks of flats, four flats per floor, and four stories high, which is out of character for the area. The statement that the frontage of the development is designed to reflect the character of Scrub Lane, is a complete fabrication, as the houses opposite relates to approx. 15dph and it will never match the current street scene. The addition of 114 homes, and over 200 cars, would cause major issues at the Scrub Lane / Rectory Rod traffic lights.</p>	Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.							<p>sufficient highway impact mitigation.</p> <p>Parking Capacity Any application for homes on this site will have to comply with policy T7 which requires the EPOA Parking Guidance (Part 1 and 2) to be implemented.</p> <p>Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.</p>	

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10250001	Individual	Martin	England		Yes	SP3	No	The draft plan is not legally compliant as it fails to consider strategic alternatives, like North West Thundersley, which has been excluded, the Biodiversity and environmental protection needs strengthening, there is no credible five-year housing land supply and a lack of evidence on cross-boundary infrastructure with a duty to cooperate. The policy of not building on the Greenbelt is biased and predetermined.	No	Justified, Consistent with national policy	It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified. An unsound plan will put all Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The policy is based on the total over development of urban sites across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Add the Greenbelt / Grey Belt sites of Kings Park HO31. Add the Greenbelt site of Land East of Manor Trading S0145 SHLAA 2018. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, Benfleet at 347, Thundersley at 643, and Hadleigh at 305, keeping Existing Commitments 480, and Windfall Allowance 675. Total housing target of 11,000	Yes	Not Answered	Yes	A	Fails to consider strategic alternatives, like North West Thundersley. Infrastructure Delivery Plan has not identified the infrastructure required to meet the demands of new development in NW Thundersley. The Council have made no attempt to work positively with developers and landowners, neighbouring authorities, Essex County Council, and infrastructure providers throughout the planning process to consider the viability of NW Thundersley. The biodiversity and environmental protection needs strengthening. There is no credible five-year housing land supply, nor does it meet the housing target for Castle Point. Lack of evidence on cross-boundary infrastructure with a duty to cooperate. The policy of not building on the Greenbelt is biased and predetermined. Greenbelt sites need total protection from government intervention.	<u>Duty to Cooperate</u> addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West	N

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											<p>implications. Adding the North West Thundersley site as an alternative has been consistently dismissed by councillors, on social media, and their own website, without foundation, as a scheme for road access was positively discussed by CPBC, ECC and Basildon Council many years ago, see attached photo. Our councillors say it is not viable but they have not proposed any plan for this site for ECC to review and object to. I do totally agree with the policy Had2, for the Hadleigh Farm area, which talks about this site as environmental, recreational, nature recovery (LNRS), biodiversity (APIBs), agricultural, farming activities, nature conservation, Site of Specific Scientific Interest, Ramsar site, East Coast Flyway World Heritage site, ecological restoration, habitat creation and connectivity. This site needs protection as an open space, promoting the heritage value with the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt.</p> <p>I concur that the Had2 policy is about protecting this greenbelt site as not suitable for development, with respect to urban sprawl, it is a buffer zone, the effect on the highways and traffic, the lack of infrastructure, protecting our farmland, protecting the wildlife, out of character, open space, heritage,</p>											<p>The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Add the Greenbelt / Grey Belt sites of Kings Park HO31. Add the Greenbelt site of Land East of Manor Trading S0145 SHLAA 2018. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, Benfleet at 347, Thundersley at 643, and Hadleigh at 305, keeping Existing Commitments 480, and Windfall Allowance 675. Total housing target of 11,000</p>	<p>Thundersley was not preferred. <u>Housing Numbers</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply:</u> See housing topic paper. Plan</p>	

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											<p>archaeology, promoting the historic links, and that we should use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. This is confirmed by the Housing Capacity Topic Paper - August 2025, which confirms sites GB8 A&B are not Potential Grey Belt, with that the complete site or sub-areas are not recommended for further consideration. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. The Salvation Army and their developers should be told in no uncertain terms that this farmland is not for development ever.</p> <p>We need a C6 Policy for this farmland, the South Hadleigh Green Lung. The south Hadleigh Green Lung will be protected and enhanced as a strategic green infrastructure asset between Hadleigh and Leigh on Sea. Its key role will be connecting ecological networks, protecting its ecological value, provide a strategically important ecological corridor, securing a high level of biodiversity net gain, have no adverse impact on the integrity of nearby habitats sites, support the creation of new habitats, through Biodiversity Net Gain, Countryside Stewardship, to support the habitat priority measures, with the nature recovery strategy and as an area of particular Importance for</p>												to provide for rolling 5 year housing land supply <u>Green Belt/Grey belt</u> covered under policy GB2. The Green Belt Assessment July 2025 reviewed all potential sites within Castle Point's Green Belt, these sites were then considered against further criteria including: environmental and heritage designations, flood risk, highways issues which impact viability, sustainability as well as having regard for the Essex LNRS and strategic opportunity areas for biodiversity improvements. Any potential grey belt sites identified within the Green Belt Assessment July 2025, were reviewed. However, none were considered suitable for	

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											<p>Biodiversity. The Plan's approach to biodiversity and environmental protection needs strengthening and developments should not proceed where it results in significant harm to biodiversity or protected sites unless that harm can be fully mitigated.</p> <p>As stated in the agricultural land document date June 2025, just over twenty-one percent of Castle Point's land is in agricultural use, and the remaining agricultural areas in the Castle Point are increasingly fragile but contribute greatly to the Borough's character and will be important to preserve. Also, given that the purpose of preservation is long-term food security, the benefits of preserving agricultural land applies regardless. Once the graded agricultural land is lost to development, it is lost forever.</p> <p>This complete site should be included for neighbourhood plans and local green space designation. This is based on the listed assets of community value, visitors, conservation areas, registered historic site, local nature reserve, Sites of Special Scientific Interest, footpaths and cycle routes, country parks, rural footpaths and nature trails, and public rights of way. This site has areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance.</p>							development as outlined in the Housing Capacity Topic Paper August 2025. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>Highways Impacts</u> The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions.	

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											I can fully support this policy Had2 with no housing development ever on this farmland site, but an unsound plan makes this site a high risk.								
1025-0002	Individual	Martin	England		Yes	Foreword	No	The draft plan is not legally compliant as it fails to consider strategic alternatives, like North West Thundersley, which has been excluded, the Biodiversity and environmental protection needs strengthening, there is no credible five-year housing land supply and a lack of evidence on cross-boundary	No	Justified, Consistent with national policy	As a campaign, the Save Hadleigh Farmland Group have their own views and opinions, which have been constantly abused by councillors on social media, to discredit me and the campaign, which continued during the consultation process, even into the last week. The SHF campaign group held a social event, at 2.15pm on Saturday 20th September, to discuss various points including the local plan consultation, and residents were intimidated by three PIP		Yes	Not Answered	Yes	A	Unhappy with councillors conduct with regards to public consultation	Noted.	N

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								infrastructure with a duty to cooperate. The policy of not building on the Greenbelt is biased and predetermined.			councillors that turned up outside, in an attempt to discredit our opinions, who were handing out their own leaflets was a blatant attempt to undermine public participation in the consultation, to deter residents from providing their views and engaging in the consultation process, thus weakening the plan's justification and effectiveness, see attached photos. This means they only want responses from the community that they approve of and their own leaflet was a fabricated biased view of political ideology, with predetermination set in most paragraphs, if you accept one piece of Greenbelt, you accept them all, and political parties and councillors are fully entitled to have views, which is predisposition, but when that agenda and those views affect your decisions making process it is predetermination, see the leaflet attached. This should be investigated by the inspector.										

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10250003	Individual	Martin	England		Yes	SP3	No	The draft plan is not legally compliant as it fails to consider strategic alternatives, like North West Thundersley, which has been excluded, the Biodiversity and environmental protection needs strengthening, there is no credible five-year housing land supply and a lack of evidence on cross-boundary infrastructure with a duty to cooperate. The policy of not building on the Greenbelt is biased and predetermined.	No	Justified, Consistent with national policy	It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. The plan needs amending as this unsound plan, for 6,200 homes,	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Add the Greenbelt / Grey Belt sites of Kings Park HO31. Add the Greenbelt site of Land East of Manor Trading S0145 SHLAA 2018. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, Benfleet at 347, Thundersley at 643, and Hadleigh at 305, keeping Existing Commitments 480, and Windfall Allowance 675. Total housing target of 11,000	Yes	Not Answered	Yes	A	Fails to consider strategic alternatives, like North West Thundersley. Infrastructure Delivery Plan has not identified the infrastructure required to meet the demands of new development in NW Thundersley. The Council have made no attempt to work positively with developers and landowners, neighbouring authorities, Essex County Council, and infrastructure providers throughout the planning process to consider the viability of NW Thundersley. The biodiversity and environmental protection needs strengthening. There is no credible five-year housing land supply, nor does it meet the housing target for Castle Point. Lack of evidence on cross-boundary infrastructure with a duty to cooperate. The policy of not building on the Greenbelt is biased and predetermined. Greenbelt sites need total protection from government intervention.	<u>Duty to Cooperate</u> addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West	N

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											will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites.						The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Add the Greenbelt / Grey Belt sites of Kings Park HO31. Add the Greenbelt site of Land East of Manor Trading S0145 SHLAA 2018. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, Benfleet at 347, Thundersley at 643, and Hadleigh at 305, keeping Existing Commitments 480, and Windfall Allowance 675. Total housing target of 11,000	Thundersley was not preferred. <u>Housing Numbers</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply:</u> See housing topic paper. Plan	

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																		to provide for rolling 5 year housing land supply <u>Green Belt/Grey belt</u> covered under policy GB2. The Green Belt Assessment July 2025 reviewed all potential sites within Castle Point's Green Belt, these sites were then considered against further criteria including: environmental and heritage designations, flood risk, highways issues which impact viability, sustainability as well as having regard for the Essex LNRS and strategic opportunity areas for biodiversity improvements. Any potential grey belt sites identified within the Green Belt Assessment July 2025, were reviewed. However, none were considered suitable for	

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																		development as outlined in the Housing Capacity Topic Paper August 2025. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>Highways Impacts</u> The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions.	

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1025004	Individual	Martin	Engl and		Yes	HAD 4	No	The draft plan is not legally compliant as it fails to consider strategic alternatives, like North West Thundersley, which has been excluded, the Biodiversity and environmental protection needs strengthening, there is no credible five-year housing land supply and a lack of evidence on cross-boundary infrastructure with a duty to cooperate. The policy of not building on the Greenbelt is biased and predetermined.	No	Justified, Consistent with national policy	It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified. An unsound plan will put all Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The policy is based on the total over development of urban sites across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Add the Greenbelt / Grey Belt sites of Kings Park HO31. Add the Greenbelt site of Land East of Manor Trading S0145 SHLAA 2018. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, Benfleet at 347, Thundersley at 643, and Hadleigh at 305, keeping Existing Commitments 480, and Windfall Allowance 675. Total housing target of 11,000	Yes	Not Answered	Yes	A	Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Parking Capacity Any application for homes on this site will have to comply with policy T7 which requires the EPOA Parking Guidance (Part 1 and 2) to be implemented. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.	N

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											<p>implications.</p> <p>The Had4 Policy is a perfect example of the over development urban policy, with an unrealistic proposal for 114 homes, using the Castle Point Density and Capacity Study, and a 100dph urban guide, in a residential area of housing currently having homes at 20dph. Housing on this site at 100dph would equate to six blocks of flats, four flats per floor, and four stories high, which is out of character for the area. The statement that the frontage of the development is designed to reflect the character of Scrub Lane, is a complete fabrication, as the houses opposite relates to approx. 15dph and it will never match the current street scene. The addition of 114 homes, and over 200 cars, would cause major issues at the Scrub Lane / Rectory Rod traffic lights. This resident led local plan said protect the Greenbelt and use the Brownfield sites, but the resident's responses did not say to destroy those areas like Scrub Lane with over development. This policy is the perfect reason why you need to add the North West Thundersley site as an alternative site, that gives us the housing numbers required, driven by an infrastructure first policy and we can reduce the over development of our urban sites across the borough.</p>													

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10250005	Individual	Martin	England		Yes	HAD3	No	The draft plan is not legally compliant as it fails to consider strategic alternatives, like North West Thundersley, which has been excluded, the Biodiversity and environmental protection needs strengthening, there is no credible five-year housing land supply and a lack of evidence on cross-boundary infrastructure with a duty to cooperate. The policy of not building on the Greenbelt is biased and predetermined.	No	Justified, Consistent with national policy	It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified. An unsound plan will put all Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The policy is based on the total over development of urban sites across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Add the Greenbelt / Grey Belt sites of Kings Park HO31. Add the Greenbelt site of Land East of Manor Trading S0145 SHLAA 2018. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, Benfleet at 347, Thundersley at 643, and Hadleigh at 305, keeping Existing Commitments 480, and Windfall Allowance 675. Total housing target of 11,000 Remove the Had3 Hadleigh Clinic site from the local plan	Yes	Not Answered	Yes	A	Objecting to HAD3 due to loss of NHS building	Policy HAD3 and Infra1 both safeguard the replacement of community facilities by ensuring that an alternative is provided and that the NHS building is surplus to requirement. Should the NHS decide that they need this building the proposed site would not be built upon.	N

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											<p>implications.</p> <p>The Had3 Policy is a perfect example of the over development urban policy, with an unrealistic and unwanted proposal for 14 homes. The Hadleigh Clinic is used by many local elderly residents from Hadleigh, who have no transport available, who walk to these clinics, and there will be no local alternative provided elsewhere nearby. The levels of health service provision must be maintained or improved with a local health hub but not removed. There is no justification to close this clinic, to re-provided the same service elsewhere in the Hadleigh area, and we have no local health hub. This local plan is just picking ludicrous sites to fulfill its urban brownfield only site selection policy, which unbelievably used AI for that site selection. With reference to Policy Infra3, Improving Health and Wellbeing, paragraph 19.41 states, there are currently four community clinics in Castle Point, so with the Had3 & Thun3A policies these will be reduced by 50% and paragraph 19.42 states, there is currently a deficit in GP practice space in Castle Point. and as new residential development is permitted, new healthcare space is required, which contradicts the Had3 & Thun3A policies.</p>														

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1025006	Individual	Martin	England		Yes	C7	No	The draft plan is not legally compliant as it fails to consider strategic alternatives, like North West Thundersley, which has been excluded, the Biodiversity and environmental protection needs strengthening, there is no credible five-year housing land supply and a lack of evidence on cross-boundary infrastructure with a duty to cooperate. The policy of not building on the Greenbelt is biased and predetermined.	No	Justified, Consistent with national policy	It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. An unsound plan will put all Greenbelt sites at risk to	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Add the Greenbelt / Grey Belt sites of Kings Park HO31. Add the Greenbelt site of Land East of Manor Trading S0145 SHLAA 2018. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, Benfleet at 347, Thundersley at 643, and Hadleigh at 305, keeping Existing Commitments 480, and Windfall Allowance 675. Total housing target of 11,000	Yes	Not Answered	Yes	A	Dredge Canvey Lake Policy C7 Agrees with improving the Canvey Lake area being master planned as a multi-functional well-used green space. Development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications.	Policy C7 comments noted <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDS Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	N

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											<p>speculative development and all our precious Greenbelt sites need total protection from government intervention. The policy is based on the total over development of urban sites across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications.</p> <p>I do agree with Policy C7 about improving the Canvey Lake area and will be master planned as a multi-functional well-used green space. This will deliver an increased capacity of the Lake from dredging for flood water storage (attenuation area), reducing flood risk to those living on the periphery of the lake, a long-term management plan of the lake to ensure the flood mitigation remains effective, improvements to water quality, a long-term management plan to maintain high quality water standards, enhancements to the habitat surrounding the lake, an environment to create an attractive and functional area, and also identified as an area of particular importance for biodiversity within the Essex Local Nature Recovery Strategy which is protected and where possible enhanced.</p> <p>I concur with the many statements made within this policy, that Canvey Island suffers from high levels of surface water</p>													

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											<p>flood risk, and during times of higher rainfall Canvey Lake becomes an important depository for excess rainwater, that poor water quality is unsafe for users, animals and biodiversity to thrive, we need to further improve the natural environment in this area and achieve the best outcomes for the natural environment, and that further work should be undertaken into the functionality of the lake and how water quality, with surface water runoff contaminates, should be managed and maintained in the future, that the Canvey Island 6 Point Plan was undertaken in 2015, which identified Canvey Lake as an important asset in managing flood water on the Island, particularly during storm events, and recommended that the capacity of the lake should be investigated, addressed, and achieved through dredging and re-profiling the banks of the lake to provide additional storage capacity, with planned regular maintenance, which would provide huge benefits for the surrounding homes, which are impacted by flooding in this area, and that Canvey Lake acts as a habitat to many different wildlife, including waterbirds and some aquatic life, there are risks to wildlife due to the water quality, however, there are huge opportunities to improve this through management of the water and to enhance wildlife through creation of new and improved habitats. This is the vision we need for Canvey Lake.</p>													

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1025007	Individual	Martin	England		Yes	HOU5	No	The draft plan is not legally compliant as it fails to consider strategic alternatives, like North West Thundersley, which has been excluded, the Biodiversity and environmental protection needs strengthening, there is no credible five-year housing land supply and a lack of evidence on cross-boundary infrastructure with a duty to cooperate. The policy of not building on the Greenbelt is biased and predetermined.	No	Justified, Consistent with national policy	It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. An unsound plan will put all Greenbelt sites at risk to	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Add the Greenbelt / Grey Belt sites of Kings Park HO31. Add the Greenbelt site of Land East of Manor Trading S0145 SHLAA 2018. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, Benfleet at 347, Thundersley at 643, and Hadleigh at 305, keeping Existing Commitments 480, and Windfall Allowance 675. Total housing target of 11,000	Yes	Not Answered	Yes	A	Policy Hou5: Concentrations of older people increases pressure on health services but HO31 could offer a doctor's surgery as part of the S106 agreement	Noted.	N

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											<p>speculative development and all our precious Greenbelt sites need total protection from government intervention. The policy is based on the total over development of urban sites across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications.</p> <p>The Hou5 Policy states, new park homes will only be supported on existing Park Home sites, and concentrations of older people increases pressure on health services but HO31 could offer a doctor's surgery as part of the S106 agreement. All our homes are robust, make provision for cold weather and risk from flooding. The Hou5 Policy states, that the siting of most park homes on the existing sites will not require new planning consent as their provision is permitted under the existing consents for the use of the site as a caravan park. We can fully support a policy that adds homes to the local plan, in the right place, but the Hou5 Policy should allow further development which improves the overall site environment for the local residents. The local plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different.</p>													

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1025008	Individual	Martin	Engl and		Yes	B8	No	The draft plan is not legally compliant as it fails to consider strategic alternatives, like North West Thundersley, which has been excluded, the Biodiversity and environmental protection needs strengthening, there is no credible five-year housing land supply and a lack of evidence on cross-boundary infrastructure with a duty to cooperate. The policy of not building on the Greenbelt is biased and predetermined.	No	Justified, Consistent with national policy	It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Co It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified. An unsound plan will put all Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The policy is based on the total over development of urban sites across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Add the Greenbelt / Grey Belt sites of Kings Park HO31. Add the Greenbelt site of Land East of Manor Trading S0145 SHLAA 2018. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, Benfleet at 347, Thundersley at 643, and Hadleigh at 305, keeping Existing Commitments 480, and Windfall Allowance 675. Total housing target of 11,000 Remove Manor Trading Industrial Estate site from the plan.	Yes	Not Answered	Yes	A	Concern for the businesses currently operating at manor trading estate Lack of engagement with businesses Forcing businesses onto canvey Innaccurate mapping as MTE is 12.5ha not 14ha Not suitable for housing	Businesses in operation The purpose of policy B8 is not to remove employment opportunities from the borough, it is a way to bring investment and regeneration to an area of which the urban environment could be improved. The allocation specifies a requirement of at least 10% increase in industrial and commercial building floor space.It does not intent for the loss of jobs, buisnesses or buisness commercial spaces. The purpose of this allocation is not to relocate any businessess. Lack of engagement with buisnesses The owner of the site submitted the land through the call for sites. If an application for development	Policy B8 Page 63 insert map to be updated to reflect policy map (removing 4 bungalows in the south west corner).

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											<p>implications.</p> <p>The inclusion of the Manor Trading Estate (MTE) as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties.</p> <p>This B8 policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on MTE. The B8 Policy for MTE will result in restricted economic growth, reduction in protected employment area, unemployment, force business to move to Canvey, and housing over employment is not an option. This policy is not evidence based, but records show poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on the MTE. CPBC vision is to create an environment that promotes</p>												<p>is submitted to the council the businesses will all be consulted. Further to this there have been multiple consultations on the Castle Point Plan where anyone has been welcome to comment. Please see the consultation statements for more information on how these were publicised.</p> <p>Innaccurate mapping Comments noted. A modification will be added to update the insert map on page 63 to reflect the policies map which excludes the four bungalows fronting onto church road. The 14ha of employment land is still accurate as this is solely a measurement for employment land.</p> <p>Housing</p>	

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											business on MTE, by removing a 25% of its employment space for housing. This vision will mean MTE businesses will be forced to move to Canvey employment zones, as previously suggested that any increase in commercial / industrial area could be accommodated on Canvey. ECC will relay objections in that any residential units near protected facilities will undoubtedly increase noise complaints. CPBC's Officers Mapping area the MTE is incorrect and misleads the public, as MTE is a max of 12.5 Ha and not the 14 Ha stated, as it does not include the properties which all front Church Road. The MTE Road & footways network is privately owned, so who will fund the new roads, footways and cycle paths across private land. The future plans for Manor Trading Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Manor Trading Industrial estate for housing, with business integrated with residential homes.												suitability Policy B8 requires a masterplan to ensure that the location of housing within the site is suitable and ensures that residential amenity is not impacted.	

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1025009	Individual	Martin	Engl and		Yes	C4	No	The draft plan is not legally compliant as it fails to consider strategic alternatives, like North West Thundersley, which has been excluded, the Biodiversity and environmental protection needs strengthening, there is no credible five-year housing land supply and a lack of evidence on cross-boundary infrastructure with a duty to cooperate. The policy of not building on the Greenbelt is biased and predetermined.	No	Justified, Consistent with national policy	It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. An unsound plan will put all Greenbelt sites at risk to	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Add the Greenbelt / Grey Belt sites of Kings Park HO31. Add the Greenbelt site of Land East of Manor Trading S0145 SHLAA 2018. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, Benfleet at 347, Thundersley at 643, and Hadleigh at 305, keeping Existing Commitments 480, and Windfall Allowance 675. Total housing target of 11,000. Remove Charfleets Industrial Estate site from the plan.	Yes	Not Answered	Yes	A	Objects to C4 because: impact on buisnesses shouldn't have housing on this site	Businesses in operation The purpose of policy C4 is not to remove employment opportunities from the borough, it is a way to bring investment and regeneration to an area of which the urban environment could be improved. The allocation specifies a requirement of at least 10% increase in industrial and commercial building floor space.It does not intent for the loss of jobs, buisnesses or buisness commercial spaces. The purpose of this allocation is not to relocate any businessess. Housing suitability Policy C4 requires a masterplan to ensure that the location of housing within the site is	N

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											<p>speculative development and all our precious Greenbelt sites need total protection from government intervention. The policy is based on the total over development of urban sites across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications.</p> <p>The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority on the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the</p>												suitable and ensures that residential amenity is not impacted.	

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											Charfleets Industrial estate for housing, with business integrated with residential homes.								
10250010	Individual	Martin	Engl and		Yes	SP3	No	The draft plan is not legally compliant as it fails to consider strategic alternatives, like North West Thundersley, which has been excluded, the Biodiversity and environmental protection needs strengthening, there is no credible five-year housing land supply and a lack of evidence on cross-boundary infrastructure with a duty to cooperate. The policy of not building on the Greenbelt is biased and predetermined.	No	Justified, Consistent with national policy	It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Add the Greenbelt / Grey Belt sites of Kings Park HO31. Add the Greenbelt site of Land East of Manor Trading S0145 SHLAA 2018. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, Benfleet at 347, Thundersley at 643, and Hadleigh at	Yes	Not Answered	Yes	A	Fails to consider strategic alternatives, like North West Thundersley. Infrastructure Delivery Plan has not identified the infrastructure required to meet the demands of new development in NW Thundersley. The Council have made no attempt to work positively with developers and landowners, neighbouring authorities, Essex County Council, and infrastructure providers throughout the planning process to consider the viability of NW Thundersley. There is no credible five-year housing land supply, nor does it meet the housing target for Castle Point.	<u>Duty to Cooperate</u> addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and	N

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											<p>justified, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.</p> <p>An unsound plan will put all Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The policy is based on the total over development of urban sites across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications.</p> <p>The Infrastructure Delivery Plan has not identified the infrastructure required to meet the demands of new development in NW Thundersley. The Council have made no contributions towards the provision of infrastructure required to make a development proposal acceptable in planning terms for NW Thundersley. The Council have made no attempt to work positively with developers and landowners, neighbouring</p>	305, keeping Existing Commitments 480, and Windfall Allowance 675. Total housing target of 11,000					<p>Lack of evidence on cross-boundary infrastructure with a duty to cooperate. The policy of not building on the Greenbelt is biased and predetermined. Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Add North West Thundersley site.</p>	<p>ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Housing Numbers</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing</p>	

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											<p>authorities, Essex County Council and infrastructure providers throughout the planning process to consider the viability of NW Thundersley. The Council will also have regard to Essex County Council's (ECC) Developers' Guide to Infrastructure Contributions. ECC play an important role as an infrastructure provider in Castle Point. The IDP fail to address the infrastructure needs to meet the growth within the Borough, with a development on the scale of NW Thundersley.</p> <p>ECC have had no plan to review over the NW Thundersley, and the council continue to categorically state that access from the A130 is not viable, and Essex County Council refuse to permit an access to the A130 but plans show a scheme was positively discussed by CPBC, ECC and Basildon Council many years ago, but this has been ignored, see attached photo. This scheme shows what can be achieved with dialogue, the intention to progress positively and working in partnership. The ECC website states, in their Development Management Policy, all proposals are assessed and determined in relation to the Development Management Route Hierarchy Policies, where vehicular access is accepted in principle, the number of access points will be kept to a minimum and new access points will be designed and constructed in accordance with the current standards,</p>													<p>need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.</p> <p><u>Housing Supply:</u> See housing topic paper. Plan to provide for rolling 5 year housing land supply <u>Green Belt/Grey belt</u> covered under policy GB2.</p> <p>The Green Belt Assessment July 2025 reviewed all potential sites within Castle Point's Green Belt, these sites were then considered against further criteria including: environmental and heritage designations, flood risk, highways issues which impact viability, sustainability as well as having</p>	

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											where existing access is to be used substandard accesses will be improved and/or upgraded in accordance with the current standards for the category of road, and all proposals are assessed and determined against current standards for the category of road having regard to the capacity, safety and geometry of the highway network. The NW Thundersley site should be added as an alternative, with 50% of the area on the call for sites and 50% of the area is grey belt factoring in PDL, but not one site has been added to the local plan.								regard for the Essex LNRS and strategic opportunity areas for biodiversity improvements. Any potential grey belt sites identified within the Green Belt Assessment July 2025, were reviewed. However, none were considered suitable for development as outlined in the Housing Capacity Topic Paper August 2025. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>Highways Impacts</u> The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending	

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																		interventions. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
10250011	Individual	Martin	Engl		Yes	THUN3	No	The draft plan is not legally compliant as it fails to consider strategic alternatives, like North West Thundersley, which has been excluded, the Biodiversity and environmental protection needs strengthening, there is no credible five-year housing land supply and a lack of evidence on cross-boundary infrastructure with a duty to cooperate. The policy of not building on the Greenbelt is biased and predetermined.	No	Justified, Consistent with national policy	It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Add the Greenbelt / Grey Belt sites of Kings Park HO31. Add the Greenbelt site of Land East of Manor Trading S0145 SHLAA 2018. Reduce the urban housing target to 3500	Yes	Not Answered	Yes	A	Objecting to THUN3 because: Accessible clinic should not be removed	Policy THUN3 required the NHS to provide assurance that the site is surplus to requirements and that the services can be provided elsewhere nearby.	N

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											<p>Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified.</p> <p>An unsound plan will put all Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The policy is based on the total over development of urban sites across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications.</p> <p>The Thun3A Policy is a perfect example of the over development urban policy, with an unrealistic and unwanted proposal for 24 homes. The Thundersley Clinic is used by many local elderly residents from Thundersley, who have no transport available, who walk to these clinics, and there will be no local alternative provided elsewhere nearby. The levels of health service provision must be maintained or improved with a local health hub but not removed. There is no justification to close this clinic, to re-provided the same service elsewhere in the Thundersley area, and we have no local health hub. This local plan is just picking</p>	<p>from 6200, with Canvey at 1050, Benfleet at 347, Thundersley at 643, and Hadleigh at 305, keeping Existing Commitments 480, and Windfall Allowance 675. Total housing target of 11,000 Remove the Thun3A Thundersley Clinic site from the local plan</p>										

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											<p>ludicrous sites to fulfill its over development urban brownfield only site selection policy, which unbelievably used AI for that site selection. With reference to Policy Infra3, Improving Health and Wellbeing, paragraph 19.41 states, there are currently four community clinics in Castle Point, so with the Had3 & Thun3A policies these will be reduced by 50% and paragraph 19.42 states, there is currently a deficit in GP practice space in Castle Point. and as new residential development is permitted, new healthcare space is required, which contradicts the Had3 & Thun3A policies.</p>									

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10720001	Individual	Harry	Engl and		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	<p>It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.</p> <p>It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site.</p> <p>I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt.</p> <p>I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of</p>	Add North West Thundersley site, reduce the urban housing target by half.	No	Not Answered	Not Answered	A	<p>Not meeting housing target</p> <p>No five year housing land supply</p> <p>North West Thundersley Green/Grey Belt Supports HAD2</p> <p>Wants policy C6 for Hadleigh</p>	<p>Housing Need</p> <p>The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology.</p> <p>However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point.</p> <p>The Castle Point Plan Regulation 19 Draft makes</p>	N

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											<p>infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction.</p> <p>We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.</p>										<p>provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025.</p> <p>Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan</p>	

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																		and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11	

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																		<p>onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport</p>	

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																		<p>evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle</p>	

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																		<p>Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out</p>	

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																		above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	

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10720002	Not Answered	Harry	England		Not Answered	C7	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	<p>It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.</p> <p>It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.</p> <p>This over development policy for Canvey will affect highways and traffic, the lack of infrastructure, sewage and poor drainage system on Canvey, and enhance the flood risks to Canvey Lake.</p> <p>I do agree with Policy C7 about improving the Canvey Lake. This needs to deliver an increased capacity of the Lake from dredging for flood water storage, reduce the flood risk, a long-term management plan of the lake,</p>	Add North West Thundersley site, reduce the urban housing target by half, Dredge Canvey Lake !!	No	Not Answered		A	Supports Policy C7 - Canvey Lake Wants the lake to be dredged	Support noted.	N

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											<p>improve and maintain water quality, enhancements to the habitat surrounding the lake, an environment to create an attractive and functional area, and also identified as an area of particular importance for biodiversity within the Essex Local Nature Recovery Strategy.</p> <p>I concur with the many statements made within this policy, that Canvey Island suffers from high levels of surface water flood risk, and with higher rainfall Canvey Lake becomes an important depository for excess rainwater, poor water quality is unsafe for users, animals and biodiversity to thrive, we need to further improve this natural environment, and how surface water runoff contaminates should be managed, the Canvey Island 6 Point Plan was undertaken in 2015, about Canvey and recommended the capacity of the lake should be investigated and achieved through to provide additional storage capacity, and that Canvey Lake acts as a habitat to many different wildlife, including waterbirds and some aquatic life with the risks to wildlife due to the water quality. This is the vision we need for Canvey Lake.</p>												
13540001	Individual	Martin	English			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N				

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											overall site environment for the local residents.								
1354002	Individual	Martin	Englsh			SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			No five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).	

I D R ef	Individual/ Organisatio n/Agent?	Firs t Na me	Last Nam e	If orga nisat ion - nam e	Has agreed to public ation of Name/ Comm ents?	Poli cy/P ara No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a . So und ?	3b. Positive/Effect ive/Justified/C onsistent?	3c. Explanation	4. Suggested modifications	5. Wis h to part icip ate in exa m	6. Why ?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																	<p>land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic</p>		

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																		<p>paper.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments</p>	

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																		guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of	

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																		<p>additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to Canvey. SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site</p>	

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																		circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1354-0003	Individual	Martin	English			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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11730001	Individual	Lilian	Eniffer			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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																		<p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u></p>	

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																		Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1173-0002	Individual	Lilian	Eniffer			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
11	Individual	Lilian	Eniffer			C4					The number of Canvey West homes puts residents in the East						Development at West Canvey will impact	The safety of all Castle Point	N

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730003											at risk with emergency evacuation procedures.						emergency evacuation procedures for those residents living at East Canvey	residents is a priority and has been considered within the Castle Point Plan	
0670001	Individual	brad	evans		Yes	SP3	No		No	Positively prepared	Too many houses allocated to canvey island. With no thought of infrastructure or people's quality of life. Having so many houses built. potentially another 6000 cars converging on one roundabout. There is absolutely no thought for the residents of canvey. If it means building on greenbelt on the mainland to meet the government targets so be it. The amount of houses per hectre on canvey is way above any part of the borough.	For the housing allocation to be fairly spread over the borough. Maybe Hadleigh farm should be looked at again. I understand more houses will be built on canvey but not the density it states in the plan.	No	Not Answered	Not Answered		Density Third road onto Canvey Green Belt on the mainland should be released	Density The densities chosen for the sites within the Plan were informed by the Density and Capacity Study July 2025, please see this for further details. Third Road onto Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements.	N

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																		<p>The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.</p> <p>Green Belt on the mainland The Council has</p>	

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																		undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the	

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/P ara No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a . So und?	3b. Positive/Effect ive/Justified/C onsistent?	3c. Explanation	4. Suggested modifications	5. Wis h to part icip ate in exa m	6. Why ?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																		impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose.	
1160001	Individual	David	Eve			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.				Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site,	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)	

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								no credible five-year housing land supply.			3316 urban homes for Canvey is not resident led						the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition,	

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																		<p>Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p><u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments.</p> <p><u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA).</p> <p><u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.</p>	
1163-0	Individual	David	Eve			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to	N

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002								different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.										the sites environment	
1163-0003	Individual	David	Eve			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1387-0001	Individual	Pauline	Everett		Yes	Whole Plan	Yes	I support the Castle Point Plan Draft I consider the Draft Plan to be legally compliant	Yes		I consider the Draft Plan to be sound.						Castle Point Plan is sound and legally compliant,	Support Noted	N
0180001	Individual	Lyn da	Farr er		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'.	PROPOSED MODIFICATION : Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumst

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											Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	ances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0180002	Individual	Lyn da	Farr er		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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06675-0001	Individual	Lyn da	farre r		Yes	SP3	Yes	<p>As most of us are aware the Castle Point Local Plan has been published and Canvey has been earmarked for the lion's share of development.</p> <p>At first glance responding to the plan consultation is not a straightforward process.</p> <p>Therefore have summarised the salient points below. Please feel free to copy text or amend where necessary:</p> <p><input checked="" type="checkbox"/> Canvey Island lacks the infrastructure to support this proposed development plan for another 3.5k new dwellings.</p> <p><input checked="" type="checkbox"/> This development would impose a significant burden on the roads for Canvey residents who require access to and from Canvey Island. There is a single bottleneck entrance/exit at the Waterside roundabout, and current residents often find themselves in traffic jams for extended periods, even in the absence of</p>	No		<p><input checked="" type="checkbox"/> Additional amenities have not been considered, including extra medical practices, dental services, and new senior educational institutions.</p> <hr/>	<p>As most of us are aware the Castle Point Local Plan has been published and Canvey has been earmarked for the lion's share of development.</p> <p>At first glance responding to the plan consultation is not a straightforward process.</p> <p>Therefore have summarised the salient points below. Please feel free to copy text or amend where necessary:</p> <p><input checked="" type="checkbox"/> Canvey Island lacks the infrastructure to support this proposed development plan for another 3.5k new dwellings.</p> <p><input checked="" type="checkbox"/> This development would impose a significant burden on the roads for</p>	No	Not Answered	Not Answered		<p>Canvey Island lack of infrastructure Third Road needed Flood Risk</p>	<p>Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).</p> <p>Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey.</p>	N

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								<p>any incidents.</p> <p><input checked="" type="checkbox"/> Canvey Island is already susceptible to flooding. This development would impose an intolerable burden on the current drainage system.</p> <p><input checked="" type="checkbox"/> Additional amenities have not been considered, including extra medical practices, dental services, and new senior educational institutions.</p> <p>-----</p> <p><input checked="" type="checkbox"/> Suggestion No further development should take place until an additional road is established as an alternative emergency exit from the Island.</p>				<p>Canvey residents who require access to and from Canvey Island. There is a single bottleneck entrance/exit at the Waterside roundabout, and current residents often find themselves in traffic jams for extended periods, even in the absence of any incidents.</p> <p><input checked="" type="checkbox"/> Canvey Island is already susceptible to flooding. This development would impose an intolerable burden on the current drainage system.</p> <p><input checked="" type="checkbox"/> Additional amenities have not been considered, including extra medical practices, dental services, and</p>								<p>However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.</p> <p>Flood Risk Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The</p>	

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												<p>new senior educational institutions.</p> <p>_____</p> <p><input checked="" type="checkbox"/> Suggestion No further development should take place until an additional road is established as an alternative emergency exit from the island</p>							<p>recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.</p>	
0697001	Individual	Stephen	Farrow		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N	

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0460001	Individual	Ethan	Faulkner		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0808001	Individual	Gary	Faux		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, and Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered	A	No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to	N

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											<p>plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, needing planning objections with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction.</p> <p>We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.</p>												<p>progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted,</p>	

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																		<p>and from that point onwards. For further information please see housing topic paper.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a</p>	

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																		Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the	

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																		<p>Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Support for HAD2 Noted.</p> <p>A policy for the Green Lung in Hadleigh is not considered necessary as the land is</p>	

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																		safeguarded by policy HAD2	

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0809-0001	Individual	Susan	Faux		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, needing planning objections with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, and Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered	A	No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	N

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											<p>wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction.</p> <p>We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.</p>											<p>common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West</p>	

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																		<p>Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review,</p>	

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																		backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter	

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																		<p>the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Support for HAD2 Noted.</p> <p>A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD3</p>	
0957-0001	Individual	Ben	Feld		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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0200001	Individual	Clare	Fenton		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION : Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0200	Individual	Clare	Fenton		Yes	C4	No	Canvey West homes puts residents in the East at risk with	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at	Needs of emergency services	N

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2-00002								emergency evacuation procedures.									risk with emergency evacuation procedures	considered in the supporting Infrastructure Delivery Plan (IDP).	
0943-0001	Individual	Alfie	Fennings		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0945-0001	Individual	George	Fennings		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0264-0001	Individual	Carole	Ferguson		Yes	SP3	No	Dear Sir/Madam, This is my own personal response to the Castle Point Plan Regulation 19 Draft consultation. I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, consistent with National Policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets	No	Not Stated	No		Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,

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											appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes. The access roads onto Canvey Island are not sufficient at the present time. A further road(s) must be a priority in order to even consider further housing on the Island. Most of the roads around the Island are also not	Industrial Estate site from the plan. Total housing target of 11,000.					highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Object to proposals for residential on Charfleets.	also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											standard width which causes problems navigating the area. Consideration as to how the Island's roads would cope with the copious amount of building traffic that would need to access the Island would need to be a further priority.							and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	
0264002	Individual	Carole	Ferguson		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Not Stated				No	Not Stated	No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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14260001	Agent	John	Ferguson	Collective Planning	Yes	SP3	No	Introduction BlueSquare Homes Ltd represents Thundersley Investments Ltd and owners of the site located to the south of The Chase, Thundersley. The company unifies the owners into a consortium to promote residential development at the site. Options have been granted to BlueSquare Homes Ltd by the owners, who empower them to speak on behalf of all those owners. A site location plan showing the land our client owns is attached at Appendix 1. Our client is in the process of bringing forward a residential led scheme through the planning process, and has engaged with planning officers through a pre-application process over the past 5 years. The site previously formed part of a site allocation for new housing in the previous (now withdrawn) Local Plan, that was found sound by an Inspector (Inspector's Report at Appendix 2). Approach to Housing Provision The Regulation 19 Consultation refers to the standard housing	No		Further sub area assessment of GB12 in the appendices again confirms weak contributions of the site to purposes a and c of the Green Belt and no contribution to purpose b. The conclusion states, "If the sub-area were released it would be unlikely to significantly harm the performance of the wider Green Belt due to its self-contained nature within the built-up area of Thundersley and reflecting its isolation from the wider Green Belt." The same site was also tested at the previous Local Plan examination. In this instance the Inspector concluded at para 106, "Given the need for housing which cannot be accommodated within the existing urban area and the limited harm to the Green Belt, I find that there are exceptional circumstances for removing this site from the Green Belt." This is therefore one example of a recognised poor performing Green Belt site that the Local Authority has chosen to not release from the Green Belt for housing. This demonstrates that the housing target is flawed as they are unprepared to utilise Green Belt sites (that do not meet the purposes of the Green Belt) to meet the housing need. The housing number and the position on not releasing further Green Belt sites for redevelopment is therefore unsound and an 'exceptional' departure from the standard housing target is unjustified. Site GB12 Contribution to Housing Green Belt matters in relation to	Site GB12 should be a site that is removed from the Green Belt for the reasons set out above, to ensure it can make an optimum contribution to meeting housing need, and the current approach of the Local Plan to adopt a lower housing target when there are developable sites that could be used for housing is unsound.			Yes, Site Boundary and Report to Castle Point Borough Council by Philip Lewis BA(Hons) MA MRTPI an Inspector appointed by the Secretary of State		Site GB12 should be a site that is removed from the Green Belt for the reasons set out above, to ensure it can make an optimum contribution to meeting housing need, and the current approach of the Local Plan to adopt a lower housing target when there are developable sites that could be used for housing is unsound.	Noted	N

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								<p>methodology target of 11,662 new homes over the plan period or 686 dwellings per annum. However, the Regulation 19 Consultation sets an alternative housing target of 6,196 new homes. There are a number of reasons given for this reduced target including the historical low rate of delivery, Green Belt restrictions, and infrastructure constraints. The housing target of 6,196 (almost half the required target under the housing standard methodology), is fundamentally flawed. As set out in the NPPF, the Government's objective is to significantly boost the supply of homes, with the overall aim to meet an area's identified housing need. The fact that the Local Authority has Green Belt land is not a legitimate reason to arrive at such a reduced housing target. This position also contradicts a previously held position the Local Authority took on the release of Green Belt land for housing under the previous Local Plan (that was found sound</p>			<p>housing targets are addressed above. Site GB12 is used as an example of a recognised poorly performing Green Belt site meeting the exceptions test for release from the Green Belt. However, aside from Green Belt considerations, this site is considered within the SHLAA as being viable and developable, and therefore must be considered as a viable option for housing. The SHLAA confirms the site's suitability for development against all criteria except for local wildlife site 'unknown'; contaminated land 'unknown' and public open space 'unknown'. These matters can all be addressed through a planning application scheme. This site is particularly well suited to housing as recognised by the SHLAA, but also for the following reasons:</p> <ul style="list-style-type: none"> - Limited Contribution to Wider Green Belt <p>The site is surrounded by built development on all 4 sides. This comprises housing to the south, east and north, and various uses including civic, leisure and education to the west. Therefore, the site is already largely enclosed by existing development and impact of this site being developed on the openness of the green belt is very limited</p> <ul style="list-style-type: none"> - Sustainable Location <p>The site is located in a sustainable, accessible location in Thundersley. Benfleet railway station is approximately 2.7km to</p>									

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								by the Inspector (2023), but not adopted by the Local Authority). In this instance the Inspector (at paragraph 45 of the report) stated 'there are strategic level exceptional circumstances to alter the Green Belt boundary to meet housing needs in the interests of the proper long-term planning of the Borough'. The reasoning included: The need for housing; and The supply and availability of land suitable for sustainable development. This plan proposed the release of a number of Green Belt sites for housing. It should be noted this was under a more restrictive NPPF position on Green Belt release, that has since changed and made provision for exceptional circumstances for a review of Green Belt boundaries. The NPPF is clear that exceptional circumstances include instances where a Local Authority cannot meet its identified need for homes through other means. It is therefore considered			the southwest with services to London Fenchurch Street, Southend Central, Shoeburyness and Leigh On Sea. There are bus stops along Kiln Road, the closest being the Warren Chase bus stops, which have services operating towards Benfleet railway station, Rayleigh, Basildon Town Centre, Canvey, Southend-on-Sea and North Shoeburyness. The site is in close proximity to a number of local shops, services and amenities, particularly immediately to the west of the site where Castle Point Borough Council, Runnymede Leisure Centre Runnymede Hall and USP College are located. - Public Benefits Alongside the potential for the site to deliver new housing and affordable housing, the site also has the ability to improve public access and improved permeability through the site. Currently the site is privately owned and whilst there are informal routes through the site that neighbouring residents sometimes use, there is an ability of a new development to provide public access through the site linking east to west and north to south. This will benefit residents of the surrounding area, improving access to the leisure, civic and education uses to the west. As well as public footpaths the scheme can also provide cycle routes through the site. Any new scheme will also deliver new public open space that will significantly benefit the											

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								that exceptional circumstances apply here to review Green Belt boundaries. The Local Authority will claim the Green Belt review provides evidence that reviewing the Green Belt boundaries would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan, however the Green Belt Assessment confirms areas of Green Belt that are considered to make no or limited contribution to the purposes of the Green Belt. The Assessment considers site GB12 The Chase. Figure 14 from the Assessment shows this site makes a 'weak' performance against the purposes of the Green Belt overall and Table 12, figure 16 and figure 18 states the site could be considered grey belt upon consideration of Green Belt purposes a and b.			wider area. - Protection of Higher Quality Green Belt The site is in a sustainable location, surrounded by development. It is therefore considered a less sensitive site than other green belt sites in the district. Allowing this site to come forward for housing will ensure protection of the more sensitive, less accessible green belt sites in the district.									

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0100001	Individual	Carol	Fisher		Yes	SP3	No	Dear Sir/Madam, This is my own personal response to the Castle Point Plan Regulation 19 Draft consultation. Policy reference/name: SP3 / C4 Page number: 25-26 / 40-41 Paragraph number: 6.32-6.35 / 8.33-8.40 I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000. It also does not take into account the additional traffic to be added to the already extremely congested daily traffic problems. Also doesn't consider the local infrastructure and the need of extra dentists,	No		No	A	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDS: Policy SD3 covers SuDS and part 3 states they must reflect	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.	doctors surgeries and schools which will be required. A third road off the Island is a necessity before any such plans should be considered.					West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. Charfleets: Objects to inclusion of residential and lack of engagement,	and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes	
01080002	Individual	Carol	Fisher		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/P ara No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a . So und?	3b. Positive/Effect ive/Justified/C onsistent?	3c. Explanation	4. Suggested modifications	5. Wis h to part icip ate in exa m	6. Why ?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
0554-0001	Individual	Ivy	Fisher		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped	N

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											evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.	Strategic alternatives North west	

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																		<p>Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p>Green/Grey Belt The Council has</p>	

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																		undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the	

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																		<p>impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergen</p>	

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																		<p>cyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation</p>	

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																		Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0554-0002	Individual	Ivy	Fisher		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing	N

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																		<p>commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025).</p> <p>Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt.</p> <p>That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the</p>	

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																		Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0554-0003	Individual	Ivy	Fisher		Yes	Fore word					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N
1340-000	Individual	Ivy	Fisher			Hou 5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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01											development which improves the overall site environment for the local residents.								
1340002	Individual	Ivy	Fisher			SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			No five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).	

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																		land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic	

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																		<p>paper.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments</p>	

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																		guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of	

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																		<p>additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to Canvey. SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site</p>	

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																		circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1340003	Individual	Ivy	Fisher			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1400001	Individual	Raymond	Fisher		Yes	Whole Plan	Yes	I support the Castle Point Plan Draft I consider the Draft Plan to be legally compliant	Yes		I consider the Draft Plan to be sound.						Castle Point Plan is sound and legally compliant,	Support Noted	N

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06320001	Individual	Simon	Fitzgerald		Yes	SP3	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	The infrastructure of the whole island is not prepared for this size of development. Before any building works start there should be appropriate infrastructure already completed this includes additional roadways especially leading off and onto the island, medical facilities, schools and business opportunities to ensure a safe, climate friendly development is established to help Canvey and its residents thrive along with surrounding areas. If this is not completed then the plan is doomed to failure in a catastrophic way.	This plan would basically increase the population of Canvey Island by >25%. It needs to be completely changed and replaced.	Yes	Not Answered	Not Answered		Infrastructure needs to be provided before any housing Third road onto Canvey needed	Infrastructure The Castle Point Plan is accompanied by an Infrastructure Delivery Plan. This identifies all the infrastructure needed to support the proposed growth. Infrastructure will be delivered at different times depending on when it is most appropriate to provide it. For example, access improvements may be delivered during the early phase of a development. A school meanwhile may not be opened until there is enough children to make the revenue costs of running the school sustainable. Sometimes, financial contributions from two or more developments may be needed to provide a particular piece	N

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																		<p>of infrastructure. This may mean the infrastructure is delivered when the last site is coming forward for development.</p> <p>Third Road onto Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access</p>	

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																		improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
07120001	Individual	Simon	Fitzgerald		Yes	SP3	No	I believe it is unsafe and that the general impact on the overall community puts it at risk. Sewage issues have not been identified namely the additional 2700 homes in the Charfleets area. Canvey Island has the second worst sewage issue within the country that is directly	No	Consistent with national policy	Sewage and the impact on the general area. Traffic congestion and the impact to life especially in a time of a major incident happening on the Island.	Review the areas where it would be more suitable within the actual Borough rather than just Canvey Island	Yes	Not Answered	Not Answered		Charfleets Other sites have not been considered Sewage infrastructure	Charfleets Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui	N

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								<p>affecting the sea front along with a huge issue regarding a smell which is constantly in the air.</p> <p>There are other more suitable and safe areas within the Borough which can be identified and built on without having the same negative impact.</p> <p>The plan will fail and time and effort wasted in general. The Council need to admit this and openly honest regarding the whole process</p>										<p>generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'. This policy will apply until such time as a master plan for West Canvey has been developed.</p> <p>Policy E1 may subsequently change in terms of its approach to Charfleets when the Castle Point Plan is reviewed in 5 years' time, to enable the delivery of the West Canvey regeneration.</p> <p>Other sites have not been considered All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p>Infrastructure</p>	

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																		Infrastructure matters (including healthcare, education and sewage) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
04520001	Individual	Patrick	Flaherty		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
10030001	Individual	Daniel	Flaherty		Yes	HAD 4	Yes		Yes			Please do not build more houses here, its already super busy, traffic is a nightmare as is parking for the schools, plus there is a huge huge safety concern in terms of the flats looking over a school and school field of the infants school. Its putting children in a vulnerable position. There are so many other useful	No	Not Answered	Not Answered	A	Objecting to Had4 because: Traffic Parking Overlooking Infrastructure	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Parking Capacity Any application for homes on this site will have to comply with	N

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												<p>things that could be done with the land, please reconsider!</p> <p>Its a hugely overpopulated area already. Please please reconsider and do not build anymore flats or housing here.</p>						<p>policy T7 which requires the EPOA Parking Guidance (Part 1 and 2) to be implemented.</p> <p>Overlooking Chapter 16 - achieving well designed places will ensure that enough space is provided between the dwellings and the school playing field to safeguard school children and residents.</p> <p>Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).</p>	

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1000001	Individual	Sam	Flanders		Yes	HAD4	Yes		Yes			<p>Hadleigh and scrub lane in particular is over populated as it is. There are far too few schools and school places available and very little parking. Traffic is terrible especially during school drop off and collection without the added flats.</p> <p>There is also a concern over the fact that the flats will overlook the infants school and the school field.</p> <p>There is more than could be done with that space rather than putting in a block of flats. The area does not need any more housing.</p>	No	Not Answered	Not Answered		<p>Objecting to Had4 because: Traffic Parking Overlooking Infrastructure</p> <p>Parking Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation.</p> <p>Overlooking Chapter 16 - achieving well designed places will ensure that enough space is provided between the dwellings and the school playing field to safeguard school children and residents.</p>	<p>Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation.</p> <p>Parking Capacity Any application for homes on this site will have to comply with policy T7 which requires the EPOA Parking Guidance (Part 1 and 2) to be implemented.</p>	N

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																		Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
0230001	Individual	Kevin	Foley		Not Stated	Forward	Not Stated	As a retired IT project manager, I consider myself reasonably computer literate. However, I was genuinely astonished by how unnecessarily complex the consultation response form is. To submit a comment, one must first locate and provide all of the following: * Policy reference or name * Page number * Paragraph number * Site number or name * Objective number or name * Appendix reference or name * Table or diagram reference number * Image or map reference number This requires navigating the interactive map and cross-referencing multiple documents just to begin commenting. Frankly, it's an over-engineered process that creates unnecessary barriers to	Not Stated	Not Stated			Not Stated		No		States the consultation response form is unnecessarily complex and that it creates unnecessary barriers to participation.	Comments noted	N

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								participation. Sorry, but that's simply absurd, so I gave up completing the form.											
14350001	Individual	Denise	Foot		Yes	Whole Plan	Yes	I support the Castle Point Plan Draft I consider the Draft Plan to be legally compliant	Yes		I consider the Draft Plan to be sound.						Supports the Castle Point Plan Draft and considers it to be legally compliant	Support noted	N
02260001	Individual	Janine	Ford		Not Stated	SP3	Not Stated		Not Stated		Dear Sirs, Please read attached letters sent to the Echo. From[Redacted Personal Information] Dear Sirs, Please read the above emails sent to the Echo. I believe that they reflect the point of view of the vast majority of Canvey residents. We are extremely despondent that our views will be regarded as valid. Yours faithfully [Redacted Personal Information] to the Echo		Not Stated		Yes	A	RE: Canvey residents have been well and truly 'shafted' in Castle Point Plan being allocated 3,316 new homes. Far more than other local areas. This despite Canvey already being in desperate need of a second access route, having significant hazardous material storage and not forgetting Canvey is below sea level. 3,316 houses on Canvey - how can that be viable, fair or SAFE!.	Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Flooding and infrastructure covered by policies and supporting evidence in the	N

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																		form of the SFRA and IDP, including in relation to Canvey. Policy SD8 covers Developments near Hazardous Uses. Development proposals within the consultation zone will be assessed in accordance with the Health and Safety Executive (HSE) Guidance who may advise against development on health and safety grounds. The Council will place great weight on the recommendation provided by the HSE.	
03060001	Individual	PJ	Ford		Not Stated	SP3	No	Dear Sir/Madam, Following my visit to your offices yesterday and conversation with your officer, please accept the following as my Consultation Response to the Castle Point Plan Reg 19 Consultation. I do not support the Castle Point Plan Regulation 19 Draft Consultation and I believe it is not legally compliant as it	No	Positively Prepared, Justified, Consistent with National Policy	And by failing to meet the statutory housing target calculated using the Standard Methodology, it is not compliant with national policy, has not been positively prepared and therefore is unsound. Please see the justification below. In calculating its windfall allowance of 45 homes per year, the council appears to have included the car park at Westwood Court Sheltered Unit as a site identified as suitable to support windfall development. This is not the case. The car park is already	PROPOSED MODIFICATION S: Add North West Thundersley site Reduce densities in the Urban Town Centres Removal of Westwood Court Car Park from windfall allocation	Not Stated		No	A	Objects to Had4 The proposal for 114 homes is excessive and unsuitable for this location. The plan relies on a 100 dwellings per hectare (dph) urban density guide, whereas the surrounding area currently averages closer to 20dph. This would mean blocks of flats up to four storeys high, completely out of keeping with the	Comments noted	N

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								has no credible five years housing supply.			used to capacity to support the residents of the complex. The area is also a cul-de-sac housing a school entrance that already suffers from congestion and further housing in this area would add to an already hazardous hot spot. The Plan fails to consider reasonable alternatives when including this site as part of its windfall allocation. Residents affected have not been sufficiently consulted on allocation this prior to the draft plan being prepared and the evidence document identifying it on the map, the Castle Point Housing Capacity Topic Paper, was only uploaded on 15th August, two weeks after the Reg 19 Consultation on the Plan opened. The over development of the urban areas of Hadleigh is not sustainable. It does not take into account parking issues that have been consistently ignored in the area and exacerbating these will not support the existing traders due to falling footfall. The council's own sustainability evidence confirms that air quality will be poorer when dwellings are intensified in the urban areas. I believe NW Thundersley has not been adequately pursued as a sound, reasonable alternative. Finally, I believe Members have predetermined their decision of allowing no Green Belt to be included as a development site in the plan and this is to the detriment of the borough as a whole. Their online and in person treatment of residents questioning their approach has compromised the consultation											existing character of Scrub Lane. The claim that the design would reflect the surrounding area is misleading, as the opposite side of Scrub Lane has far lower density housing, around 15dph, and the proposed development would not blend with the existing street scene. Introducing 114 homes and over 200 cars would put huge pressure on the already busy Scrub Lane/Rectory Road junction and increase strain on local services, particularly doctors' surgeries. Additionally, pressure on local schooling and other infrastructure. Therefore to avoid putting further pressure on the local residents, ensuring that double yellow lines are put on all local roads to avoid the 200 cars parking locally, more doctors, more schools, more dentists, more local amenities, improved facilities (pipes / sewage). Residents have consistently supported the protection of Green Belt land and the use of brownfield sites for		

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											process through intimidation and misinformation.						<p>new housing. Nowhere did residents agree to destroy areas like Scrub Lane through inappropriate overdevelopment. I understand land will be built on but this is unsustainable and therefore should be more fitting to suit the current infrastructure - for example 4 luxury homes.</p> <p>It is also worth noting that there some very old trees at least 20, all oak except one, an ash, not larch which should be preserved.</p>		

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08140001	Individual	Michelle	Ford		Yes	SP3	No	Has not considered strategic alternatives like North West Thundersley. No credible 5 year housing land supply.	No	Consistent with national policy	<p>The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores greenbelt/grey belt against new NPPF guidelines.</p> <p>The draft local plan is not justified. Site selection strategy is biased and predetermined towards a no greenbelt build policy. Site selection is based on the overdevelopment of Brownfield sites.</p> <p>Not considered all sites, no greenbelt/grey belt sites added with the exclusion of North West Thundersley. NFFP guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for the unique geography of Canvey Island and the drainage infrastructure. The 3316 urban homes for Canvey are not resident led. Canvey West homes will put residents in the east at risk with emergency evacuation procedures.</p>	<p>Add North West Thundersley site 187Ha, a Greenbelt/Grey belt/Brownfield site option for 7500 homes.</p> <p>Reduce the urban housing target to 3500 from 6200 with Canvey at 1050.</p> <p>Total housing target of 11,000</p>	No	Not Answered	Not Answered	A	<p>Not meeting standard method Lack of Five Year Housing Land Supply Green/Grey Belt not considered North West Thundersley Flood Risk on Canvey Emergency Evacuation Concerns</p>	<p>Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology.</p> <p>However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point.</p> <p>The Castle Point Plan Regulation 19 Draft makes</p>	N

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																		<p>provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025.</p> <p>Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan</p>	

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																		and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11	

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																		<p>onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for</p>	

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																		<p>development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>North West Thundersley</p>	

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																		<p>North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Flooding on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood</p>	

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																		<p>Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/</p>	

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09620001	Individual	Kevin	Ford		Yes	SP3	No	Failed to consider strategic alternatives like North-West Thundersley. No credible five year housing land supply.	No	Justified, Consistent with national policy	<p>The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/Grey belt against NPPF guidelines.</p> <p>The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites".</p> <p>Not considered all sites, no greenbelt/grey belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts the residents in the East at risk with emergency evacuation procedures.</p>	<p>Add North West Thundersley site, 187Ha, a Greenbelt/Grey belt/Brownfield site option for 7500 homes.</p> <p>Reduce the urban housing target to 3500 from 6200, with Canvey at 1050.</p> <p>Total housing target of 11,000.</p>	No	Not Answered	Not Answered	A	<p>North West thundersley</p> <p>No five year housing land supply</p> <p>Not meeting housing target</p> <p>Green/Grey Belt</p> <p>Flood risk on canvey Infrastructure</p>	<p>Housing Need</p> <p>The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology.</p> <p>However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point.</p> <p>The Castle Point Plan Regulation 19 Draft makes</p>	N

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																		<p>provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025.</p> <p>Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan</p>	

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																		and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11	

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																		<p>onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport</p>	

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																		<p>evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle</p>	

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																		<p>Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out</p>	

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																		above. Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in	

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																		relation to Canvey. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	

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1380001	Individual	Michael	Ford		Yes	SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led						Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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																		<p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u></p>	

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																		Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
13080002	Individual	Michael	Ford		Yes	Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
13800033	Individual	Michael	Ford		Yes	C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
12540001	Individual	Edwin	Ford			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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																	<p>drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led</p> <p>site review is outlined within the Housing Capacity Topic Paper August 2025.</p> <p><u>Consideration of All Sites</u></p> <p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p><u>North-West Thundersley</u></p> <p>Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p><u>Green Belt/Grey Belt</u></p>		

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																		Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
12540002	Individual	Edwin	Ford			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
								policy should allow further development which improves the overall site environment for the local residents.											
12540003	Individual	Edwina	Ford			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
06930001	Individual	Claire	Fordham		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
10980001	Individual	June	Fordham		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
04650001	Individual	Caroline	Forsyth		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
07390000	Individual	Jennifer	Fox		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/P ara No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a . So und?	3b. Positive/Effect ive/Justified/C onsistent?	3c. Explanation	4. Suggested modifications	5. Wis h to part icip ate in exa m	6. Why ?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
01																			
0740001	Individual	Alexander	Fox		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
1292001	Individual	Stephen	Fox			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.				Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)	

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																	Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	

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																		Green Belt/Grey Belt Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1292002	Individual	Stephen	Fox			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
								weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
12920003	Individual	Stephen	Fox			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
12930001	Individual	Sylvia	Fox			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.				Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines	Housing Supply – Government Housing Target and Standard method Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)	

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								no credible five-year housing land supply.			3316 urban homes for Canvey is not resident led						state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability	

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																		Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1293-00	Individual	Sylvia	Fox			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
02								Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.										the sites environment	
1293-0003	Individual	Sylvia	Fox			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0690-0001	Individual	Linda	Frair		Yes	Whole Plan	Yes		Yes	Consistent with national policy			No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant	Support noted.	N
0736-0001	Individual	Robin	Frair		Yes	Whole Plan	Yes		Yes	Positively prepared			No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant	Support noted.	N
0898-0000	Individual	Richard	Frake		Yes	HAD 4	No	This plan does not consider local traffic and parking which already straining heavily on local traffic. What with the school, many using Scrub	No	Positively prepared, Effective, Justified	This plan does not consider local infrastructure, traffic and parking which already straining heavily. What with the school, many using Scrub Lane a cut through to avoid congestion on the London Road. With another 114 homes	Lack of consideration of the effect on local amenities (Schools, Doctors & Dentists),	No	Not Answered	Not Answered		Objecting to HAD4: Traffic Infrastructure	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
01								Lane a cut through to avoid congestion on the London Road. With another 114 homes this will only make to situation impossible to a point of gridlock. As a resident of Conifers it is bad enough already			this will only make to situation impossible to a point of gridlock. As a resident of Conifers it is bad enough already .This also fails to consider strain on local serviced The Hollies Doctors Surgery is already impossible to get an appointment, an another 114 home will only increase that burden.	traffic and parking						development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	

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0499-0001	Individual	Doreen	Franklin		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped	N

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											evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.	Strategic alternatives North west	

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																		<p>Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p>Green/Grey Belt The Council has</p>	

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																		undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the	

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																		<p>impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergen</p>	

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																		<p>cyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation</p>	

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																		Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0499-0002	Individual	Doreen	Franklin		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing	N

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																		<p>commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025).</p> <p>Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt.</p> <p>That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the</p>	

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																		Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0499-0003	Individual	Doreen	Franklin		Yes	Foreword					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N

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02820001	Organisation	Kevin	Fraser	Essex County Council	Yes	Whole Plan	No	Not consistent with National Policy	No	Not Justified, Not Consistent, Not Effective, Not positive	Appendix A. Policy Context (Not Sound - Effective): ECC welcomes recognition of its minerals and waste planning function in Essex and the relationship between the Plan, the Essex Minerals Local Plan (MLP) (2014) and the Essex and Southend-on-Sea Waste Local Plan (WLP) (2017), which together comprise the statutory Development Plan for the borough. However, ECC seek this is further clarified and further detail clarification provided with regards the function of Mineral Safeguarding Areas and Mineral and Waste Consultation Areas including the potential requirement for a Mineral or Waste Infrastructure Impact Assessment (MIIA or WIIA).		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Supports recognition of Minerals and Waste Planning Function in Essex. Further clarification and detail required in the supporting text regarding the function of Mineral Safeguarding areas and Mineral and Waste Consultation Areas and the potential requirement for a Mineral or Waste Infrastructure Impact Assessments	Accepted Additional clarification but shortened text added as requested to provide clarity.	Essex County Council is the Minerals Planning Authority for Castle Point Borough and is responsible for the preparation of the Minerals Local Plan 2014 (MLP), which is currently being reviewed. The MLP forms part of the Statutory Development Plan for the borough and should be read alongside the Castle Point Plan. Essex County Council must be consulted

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																			on all non-mineral related development proposed within a Minerals Safeguarding Area (MSA) that meet thresholds defined in the MLP. A Mineral Resource Assessment may need to be undertaken in advance of development. The MLP designates Mineral Consultation Areas (MCAs) at a distance of 250m around active quarries, mineral infrastructure and deposits and any

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																			<p>development within these areas will require a Mineral Infrastructure Impact Assessment.</p> <p>Essex County Council is the Waste Planning Authority for Castle Point Borough, and the Essex and Southend-on-Sea Waste Local Plan (WLP) July 2017 forms part of the Statutory Development Plan for the borough and should be read alongside the Castle Point</p>

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																			Plan. The WLP designates Waste Consultation Areas (WCAs) at a distance of 250m around permitted and allocated waste management facilities or within 400m of a Water Recycling Centre. A Waste Infrastructure Impact Assessment will be required for any development within these thresholds to ensure there is no adverse impact on their existing or future

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																			operation .
0282002	Organisation	Kevin	Fraser	Essex County Council	Yes	Vision	No	ECC welcomes the inclusion of Objective 18, which refers to “well-designed homes that meet local needs in terms of quantity, affordability and any accessibility requirements.” This aligns with ECC’s strategic priorities around inclusive housing and accessibility. However, the Vision and Objectives do not explicitly acknowledge the borough’s ageing population or the need for affordable specialist accommodation. This issue was identified in ECC’s Regulation 18 response to Question 1 of that consultation and the suggested amendments enable this to be satisfied. The Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025) provides updated evidence of future housing need in Castle Point, including:	No	Effective	ECC welcomes the inclusion of Objective 18, which refers to “well-designed homes that meet local needs in terms of quantity, affordability and any accessibility requirements.” This aligns with ECC’s strategic priorities around inclusive housing and accessibility. However, the Vision and Objectives do not explicitly acknowledge the borough’s ageing population or the need for affordable specialist accommodation. This issue was identified in ECC’s Regulation 18 response to Question 1 of that consultation and the suggested amendments enable this to be satisfied. The Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025) provides updated evidence of future housing need in Castle Point, including:	Replace Objective 18 with following text “Provide well designed homes that meet local needs in terms of quantity, affordability, care, support and accessibility requirements.”	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	The newly Specialist Housing and Accommodation Needs Assessment (SSHANA, July 2025) has been published and provides evidence on future specialist and supported housing needs in Castle Point. The vision and objectives need to reflect new evidence. For the Vision and Objectives to incorporate findings from the recently published evidence from The Specialist Housing and Accommodation Needs Assessment (SSHANA, July 2025). Supports the GI objectives protecting green spaces and provision of high-quality, multifunctional GBI within the Vision and Objectives supported by key strategic frameworks of the ELNRS and the South Essex GBI strategy. Comments that GBI also has	Accepted: Additional text included into the Vision and Objectives to acknowledge the need for affordable specialist accommodation based on the evidence from the SSHANA July 2025. Accepted: The Vision and Objectives updated to include evidence from the SSHANA July 2025 to address the needs of an aging population within this objective Noted	Replace with following text “Provide well designed homes that meet local needs in terms of quantity, affordability, care, support and accessibility and any accessibility requirements.” Replace with the following text “Secure improved health and wellbeing outcomes for residents enabling

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								<ul style="list-style-type: none"> • 1,056 retirement/sheltered housing units • Approx. 710 market units • Approx. 346 affordable/social rent units • 594 extra care housing units • Approx. 385 market units 			<ul style="list-style-type: none"> • 158 wheelchair-accessible homes (M4(3)) • 15 residential placements for Children in Care <p>It also provides evidence for supported housing units for people with learning disabilities, autism, physical/sensory impairments, mental health needs, and lower-level support needs.</p> <p>The figures set out above should be treated as estimated need rather than delivery targets. While the SSHANA was finalised after the publication of this consultation its draft outputs should be considered for inclusion in the Submission Plan. It provides proportionate evidence to support the refinement of strategic objectives. ECC considers that the current Vision does not reflect these needs, nor reference accommodation requirements for children in care, care leavers, or adults with complex needs.</p> <p>The amendment to Objective 18 will enable the concerns made at Regulation 18 to be satisfied and are supported by evidence in the Local Housing Needs Assessment (2023) and the Essex Supported and Specialist Housing and Accommodation Needs Assessment (2025); align with ECC's statutory duties under the Care Act 2014 and Children Act 1989; and are consistent with NPPF paragraph 63 addressing the housing needs of different groups in the community.</p> <p>The Essex Supported and</p>						additional benefits of placemaking including enhanced connectivity via active and sustainable modes, flood risk management, health and wellbeing and climate adaptation.		more active and healthier lifestyles, creating healthy Living environments and reducing health inequalities ensuring inclusive communities

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											<p>Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025) provides updated evidence of future housing need in Castle Point. It also provides evidence for supported housing units for people with learning disabilities, autism, physical/sensory impairments, mental health needs, and lower-level support needs. The Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025) provides updated evidence of future housing need in Castle Point. It also provides evidence for supported housing units for people with learning disabilities, autism, physical/sensory impairments, mental health needs, and lower-level support needs.</p> <p>The Vision and Objectives do not explicitly acknowledge the borough's need for affordable specialist accommodation. This issue was identified in ECC's Regulation 18 response to Question 1 of that consultation and the suggested amendments enable this to be satisfied.</p> <p>The amendment to Objective 19 will enable the concerns made at Regulation 18 to be satisfied and are supported by evidence in the Local Housing Needs Assessment (2023) and the Essex Supported and Specialist Housing and Accommodation Needs Assessment (2025); align with ECC's statutory duties under the Care Act 2014 and</p>												

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											<p>Children Act 1989; and are consistent with NPPF paragraph 63 addressing the housing needs of different groups in the community. ECC welcomes the inclusion of Green and Blue Infrastructure (GBI) within the vision and environmental objectives of the Plan.</p> <p>Recognition of key strategic frameworks including the Essex Local Nature Recovery Strategy (ELNRS), the South Essex GBI Strategy, and SEE Park is supported. Their integration demonstrates a positive commitment to enhancing ecological networks and supporting nature recovery at both local and regional scales.</p> <p>ECC welcomes the inclusion of Green and Blue Infrastructure (GBI) within the vision and environmental objectives of the Plan. Recognition of key strategic frameworks including the Essex Local Nature Recovery Strategy (ELNRS), the South Essex GBI Strategy, and SEE Park is supported. Their integration demonstrates a positive commitment to enhancing ecological networks and supporting nature recovery at both local and regional scales.</p> <p>ECC particularly support the Plan's ambition to protect existing green spaces and increase the provision of high-quality, multi-functional GBI. This approach not only contributes to biodiversity and climate resilience but also promotes healthier lifestyles through improved connectivity</p>									

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											<p>and active travel opportunities. Strengthening these networks will be vital in delivering sustainable development and improving the wellbeing of communities across the borough.</p> <p>While GBI is captured within the environmental objectives and chapter, it is important in the delivery of the local plan to not silo GBI and that its function and benefits extends across multiple plan areas. For instance, GBI contributes significantly to placemaking, flood risk management, climate adaptation, health and wellbeing, education and sustainable transport. A more integrated approach that highlights these cross-cutting benefits throughout the Plan will help ensure GBI is fully embedded in decision-making and delivery.</p>									

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0282003	Organisation	Kevin	Fraser	Essex County Council	Yes	SP1	No	<p>3. Effective ECC support the delivery of the ELNRS, providing protection and enhancement to the Areas of Particular Importance for Biodiversity as identified in the ELNRS. The ELNRS helps to identify areas for habitat creation and enhancement; prioritise areas for action; support and promote nature recovery; and deliver coordinated action for biodiversity and climate resilience</p> <p>The ELNRS includes two key map types:</p> <ul style="list-style-type: none"> • Areas of Particular Importance for Biodiversity (APIBs): Nationally and locally designated sites. • Opportunities Mapping: <ul style="list-style-type: none"> o Strategic Opportunities – Areas with potential for habitat creation (e.g. woodland, grassland, scrub, freshwater, coastal and marine). o Potential Opportunities – Urban and other areas where habitat creation could be beneficial. <p>APIBs are not included within the opportunities mapping. Therefore, the Strategic</p>	No		<p>Whilst the ambition to `safeguard` Strategic Combined Opportunity Areas is welcomed, the formal weighting of the ELNRS within the planning system is still to be defined, pending further government guidance. However, ELNRSs do provide a statutory framework, requiring public authorities to have regard to them in decision-making, as set out in Planning Practice Guidance (PPG). They offer a clear, evidence-based understanding of local opportunities for nature recovery, which can inform planning policies and decisions. To avoid weakening policy wording while awaiting clarity on the ELNRS's formal status, ECC seek the term `safeguarded` is removed from the policy and replaced with the phrase `...development proposals are designed to enable and support the habitat priority measures identified within Strategic Combined Opportunity Areas`. This would provide consistency with other policies in the Plan, regarding Canvey (Policy C1, C4, C6, C8 and C9); South Benfleet (B1, B4, B7, B8 and B9); Hadleigh (Had1, Had2, Had3); Thundersley (Thun2); Daws Heath (DH1); Policy E1- Development on Strategic Employment Land; Policy ENV2 – Coastal and Riverside Strategy; and Policy ENV4 - Local Wildlife and Geological Sites. ECC support the focus of the policy on identifying new opportunities within and adjacent to existing urban areas to deliver multi-</p>	Essex County Council is the Waste Planning Authority for Castle Point Borough, and the Essex and Southend-on-Sea Waste Local Plan (WLP) July 2017 forms part of the Statutory Development Plan for the borough and should be read alongside the Castle Point Plan. The WLP designates Waste Consultation Areas (WCAs) at a distance of 250m around permitted and allocated waste management facilities or within 400m of a Water Recycling Centre. A Waste Infrastructure Impact Assessment will be required for any	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	<p>Supports policies to deliver the ELNRS through the local plan but queries the weight given to Strategic Combined Opportunity Areas within the local plan. Considers that the word “safeguarding” implies that Strategic Combined Opportunity Areas have the same weighting as statutory designations, including the APIBs. ECC request replacing the word “safeguard” with “enable and support”. Supports this policy criteria but recommends referencing “urban greening” to ensure nature recovery and climate resilience is embedded in urban areas as well as undeveloped areas. Supports the reference to Essex Green Infrastructure Strategy and GI standards. Points out that the ELNRS identifies priority areas as well. Typo missing “t” on requirement The ELNRS is one tool of a number which contribute to the biodiversity duty Supports the view that Green Belt has wider benefits from preventing urban</p>	<p>Not Accepted. The Council has a legal duty to have regard to the relevant Local Nature Recovery strategy for their area within their local plans. Paragraph 192 (a) of the NPPF states that plans should identify, map and safeguard areas identified by national and local partnerships for habitat management, enhancement, restoration or creation... it then goes on to say that (Local Planning Authorities) “should consider what safeguarding would be appropriate to enable the proposed actions to be delivered, noting the potential to target stronger safeguarding in areas the local planning authority considers to be of greater</p>	<p>1.... Ensuring those areas identified as Strategic Combined Opportunity Areas are safeguarded and enhanced to deliver the additional nature benefits identified to create new connections between habitat areas; 2. Identifying new urban greening opportunities within and adjacent to the existing urban areas to deliver multi-</p>

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								<p>Combined Opportunity Areas are not statutory designations, so do not have the same weighting, but they are strategic priorities for investment and coordinated action. The ELNRS encourages local authorities and partners to focus efforts in these areas to maximise impact. These areas are intended to deliver the greatest combined benefits for biodiversity, climate resilience, water management, and public wellbeing. They aim to connect fragmented habitats and support the Nature Recovery Network.</p>			<p>functional green infrastructure that enhances nature, habitat resilience, and climate resilience. However, ECC seeks the wording includes reference to 'urban greening', as this will help ensure that nature recovery and climate resilience are embedded across all parts of the borough, not just in peripheral or undeveloped areas. ECC support reference to the Essex Green Infrastructure Strategy and GI Standards in paragraph 6.5 as evidence of South Essex's environmental quality. However, the ELNRS also provides robust, evidence-based support for this and should be referenced here, as well as in paragraph 6.10. The ELNRS identifies priority areas and opportunities for nature recovery, making it highly relevant to the overall environmental context of the plan. The ELNRS should not be seen as the sole mechanism for meeting the biodiversity duty under the NERC Act 2006. While the ELNRS is a significant and statutory consideration, it is one of several tools that support this duty. Fulfilling the biodiversity duty requires a broader approach that includes integrating biodiversity across planning, land management, and decision-making. Therefore, while the ELNRS is a valuable resource, it should be seen as part of a wider suite of strategies and actions that contribute to meeting the biodiversity duty. We welcome the recognition of the Green Belt wider benefits beyond preventing</p>	<p>development within these thresholds to ensure there is no adverse impact on their existing or future operation.</p>				<p>sprawl, it also supports nature conservation and delivery of green and blue infrastructure and references Kirby Scott and Walsh study Landscape and Urban Planning March 2025</p>	<p>importance. " This position is further supported by Section 40 & 41 of the NERC Act 2006. Essex LNRS map identifies that large areas of Castle Point are areas of particular importance to Biodiversity (APIB), particularly around Canvey Island. Further inland there are various isolated APIBs which are Local Wildlife sites and Ancient Woodland. The strategic combined opportunity areas connect these APIBs to form nature corridors through habitat creation The Essex Biodiversity Net Gain Evidence for Need Aug 2024 refers to the difficulties that isolated designated sites have in surviving with many being in poor</p>	<p>functional green infrastructure that provides nature-based enhancements, habitat resilience and climate resilience It also has a key role to play in the overall quality of the environment in South Essex as evidenced by the Essex Local Nature Recovery Strategy, South Essex Green and Blue Infrastructure Strategy, Essex Green Infrastructure Strategy and</p>	

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											<p>urban sprawl, particularly in supporting nature conservation and the delivery of green and blue infrastructure. This broader view aligns with the NPPF (2024), paragraphs 156(C) and 159, which highlights the importance of enhancing green spaces to improve landscape character, support nature recovery, and meet local or Natural England standards for Accessible Green Space and Urban Greening Factor provision.</p> <p>To support this approach, the study “A Greener Green Belt? Co-developing Exploratory Scenarios for Contentious Peri-Urban Landscapes” by Kirby, Scott, and Walsh may be of interest. It explores future scenarios for England’s Green Belts, including a shift toward multifunctional landscapes that balance development pressures with climate resilience, biodiversity, and public wellbeing. The study highlights a growing consensus around the need for Green Belts to evolve into strategic urban support landscapes that deliver multiple environmental and social benefits.</p> <p>https://researchportal.northumbria.ac.uk/en/publications/a-greener-green-belt-co-developing-exploratory-scenarios-for-cont</p>												condition. These include the decline of woodland and woodland birds in Essex and the loss of Local Wildlife sites (LoWS), the study cites one large LoWS in Castle Point which was lost to residential development in 2022.It concludes that strategic opportunity areas will provide the most benefits for nature recovery over onsite biodiversity improvements (those within the red boundary), where quality would be compromised. Castle Point is a small borough of approximate 17 square miles with a population density of circa 5000 per square mile, consequently its biodiversity uplift opportunities are more limited than other local	Green Infrastructure Standards and the associated proposals for the SEE Park. Remove school playing fields from open space designation Proposed text amendment to criteria 1 Ensuring those areas identified as Strategic Combined Opportunity Areas are safeguarded protected and enhanced to deliver the additional nature benefits identified

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																		authority areas. In response to the current guidance already referred to CPBC considers that the connections provided by the Strategic Opportunity Areas are important for isolated APIBs to survive and should therefore be "safeguarded" in order for the Council to meet its biodiversity duty in demonstrating improvements within the Borough. The policies Canvey (Policy C1, C4, C6, C8 and C9); South Benfleet (B1, B4, B7, B8 and B9); Hadleigh (Had1, Had2, Had3); Thundersley (Thun2); Daws Heath (DH1); Policy E1-Development on Strategic Employment Land; Policy ENV2 – Coastal and Riverside Strategy; and	to create new connections between habitat areas; "protect and enhance" should replace 'enable and support' in policies C1, C4, C6, C8 & C9 etc. South Benfleet (B1, B4, B7, B8 and B9); Hadleigh (Had1, Had2, Had3); Thundersley (Thun2); Daws Heath (DH1); Policy E1-Development on Strategic Employment Land; Policy ENV2 – Coastal and Riverside

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																		<p>Policy ENV4 - Local Wildlife and Geological Sites will be amended to be consistent with SP1 Criteria 1 Accepted: The Council considers that finding opportunities for biodiversity improvements within Castle Points Urban Areas is important for nature recovery, climate resilience and community wellbeing. Accepted: The Council agrees that the ELNRS is an important document in identifying opportunities for improving the natural environment and works in tandem with the Essex Green Infrastructure Strategy and GI Standards Noted and Corrected: Noted. The Council agrees that there are a number of tools which contribute</p>	<p>Strategy; and Policy ENV4 - Local Wildlife and Geological Sites.</p>

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																		to meeting the biodiversity duty, the ELNRS is the most significant one. Noted: The Council agrees that the Green Belt provides for wider benefits	
0282004	Organisation	Kevin	Fraser	Essex County Council	Yes	SP2	No	ECC support the aim to deliver well-designed neighbourhoods that enhance the local environment and create attractive, liveable places. As part of this, there is a clear opportunity to incorporate urban greening, particularly through the use of tools like Natural England's Urban Greening Factor (UGF) consistent with Policy ENV3 – Securing Nature Recovery and Biodiversity Net Gain, criteria d.3. ECC support the requirement for a masterplan, approved by CPBC, to be in place	No		ECC require Criteria 3b is amended to read: Support the delivery of well-designed neighbourhoods, which enhance the local environment, enable urban greening, to create places where people want to live, work, and visit now and in the future;		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Recommends the addition of urban greening to be included to deliver well-designed neighbourhoods that enhance the local environment Supports the requirement for masterplans prior to submission of a planning application and recommends that they are landscape-led to ensure that GBI, biodiversity and climate resilience are considered at the outset.	Accepted: The Council agrees that urban greening provides opportunities for creating attractive neighbourhoods.	3b. Support the delivery of well-designed neighbourhoods, which enhance the local environment, enable urban greening, to create places where people want to live, work, and visit now and

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								prior to the submission of a planning application. Masterplans should encourage a landscape-led approach to design to ensure that GBI, biodiversity, and climate resilience, and the ELNRS are considered from the outset, shaping development around the natural environment rather than retrofitting it.											in the future

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02820005	Organisation	Kevin	Fraser	Essex County Council	Yes	SP3	No		No	Justified, consistent with national policy	ECC does not consider the Castle Point Local Plan (CPLP) to be legally compliant due to its failure to meet its standard methodology housing need requirement as outlined in the NPPF and National Planning Practice Guidance (NPPG). Paragraph 62 of the NPPF states that “to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance.” The current target for CPBC is 686 homes per annum using the standard method set out in the NPPF 2024, and updated to May 2025, which equates to 11,662 homes over the Plan period to 2043. The Plan is seeking to provide 6,196 homes (53%) up to 2043 within the existing urban area only, which results in a significant unmet housing need of around 5,500 homes. Housing requirements have significantly increased across South Essex (around 28%) and there are notable physical and environmental constraints, including a substantial proportion of land designated as Green Belt, international/National and local environment constraints, highway and junction capacity pressures and a significant proportion falling within Flood Risk Zone 3. CPBC have held meetings under the duty to cooperate with its neighbours within the Strategic Housing Market Area,	ECC considers that CPBC has not fully met its legal compliance with respect to the Duty to Cooperate and the IDP given: <ul style="list-style-type: none"> the IDP May 2025 is not based on the infrastructure requirements required to deliver 6,196 homes in Policy SP3 but three growth scenarios between 4,862 to 8,845 homes; significant evidence base referenced in the Plan has been completed post the preparation of the IDP, May 2025, including the Transport Assessment, and which ECC had not reviewed prior to the consultation; Prior to submission, ECC will need to undertake a cumulative assessment of 	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Considers the Castle Point Plan does not meet the Standard Methodology Housing Need requirement outlined in NPPF, but notes that there are notable environmental constraints including Green Belt, International and National designations, flood risk and highway and junction capacity issues. Comments that Castle Point has had DtC meetings and made requests for its neighbouring authorities to assist with its unmet housing needs and no opportunities have come forward outside its boundaries to meet its unmet need. Recommends SoCG prepared. Notes that evidence has been put forward to support CPBC housing strategy but queries its robustness and transparency in light of the short fall of housing. Queries the non-inclusion of any potential development sites assessed in the Green Belt assessment including those that were previously recommended for	housing delivery can be realistically achieved within its boundaries taking into account its significant environmental and infrastructure constraints as well as the capacity of the housing market to deliver the level of growth . The CPBC position is supported by evidence from the Green Belt Assessment, Strategic Land Availability Assessments and Housing Topic Paper. Sites were assessed according to various criteria including Green Belt role, flood risk, impact on designated environmental and heritage sites, regard to the Essex LNRS, site access, transport network capacity and viability	Housing Supply at April 2023 2025 Thorney Bay (transitioning to Sandy Bay)

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											neighbouring and nearby local planning authorities and requested whether those councils would be willing to take any unmet need (non-defined level of need). Early responses suggested not. Likewise, CPBC has received requests from adjoining and nearby authorities to meet their unmet need to which the Council has responded negatively given the constraints in the Borough. Implementing the Duty to cooperate and the preparation of Statements of Common Ground is the most constructive approach to progress the matter. It should be noted that the DtC does not extend as far as a duty to agree that the borough's unmet need can be accommodated. In addition, ECC has some concerns regarding the robustness and transparency of the evidence to justify the significant shortfall of 5,500 homes. For example, the Green Belt Sites Assessment concludes that only a limited number of Green Belt sites may be suitable for further consideration, but none are allocated. It is unclear what 'weight' has been given to the assessment of these sites with regards: <ul style="list-style-type: none"> • how circumstances have substantially changed on several Green Belt sites which were allocated in the withdrawn Plan by CPBC and supported by the Inspector following examination, with regards their impact on highway capacity, opportunities to enhance active and 	the growth consistent with Section 3.4 of the Essex County Council Local and Neighbourhood Planners' Guide to School Organisation and Place Planning (September 2025) for education and early years and childcare to inform, policy requirements; the IDP and Whole Plan Viability Assessment. Prior to submission, the IDP will need to be updated to reflect the significant new policy guidance and evidence base that has been undertaken since it was prepared early in 2025. ECC recommend the Table supporting Policy SP3 is updated to read:				allocation in the 'withdrawn' Local Plan, the inconsistent weight given to 'significant' and 'severe' impact of growth on highway capacity in determining site deliverability in transport terms and the weight applied to Strategic Combined Opportunity Areas for biodiversity in site allocation criteria.	implications. The Castle Point Plan is a new and different plan based on new evidence and is not comparable to the previously withdrawn plan of June 2022. CPBC realises that the Castle Point Plan delivers considerably less housing than the Standard Method Housing Need but considers based on the evidence that this is a realistic housing delivery. Unmet Housing Need has been considered through the SEC and directly with neighbouring authorities. Relevant Statements of Common Ground have been put in place. Ultimately, the soundness and legal compliance of the Castle Point		

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											<p>sustainable travel measures, and issues regarding site access (namely partly via residential routes).</p> <ul style="list-style-type: none"> the inconsistent reference to the `severe' impact of growth on the highway network – the TA refers to `significant impact' and parts of the Plan refers to `severe' with regards the general performance of the network and at specific locations. It is unclear what `weight' has been given to the impact on the highway network in determining the deliverability of sites identified in the Green Belt Site Assessment. A number of recent appeals have been allowed despite junctions modelled as being operating at or close to capacity. The impact was not considered severe by Inspectors with respect to NPPF e.g. APP/F2360/W/22/3295498 for housing at Penwortham, Preston. CPBC will need to be satisfied that their approach to severity is defensible at examination. the weighting given to Strategic Combined Opportunity Areas (SCOA) identified in the ELNRS. This may have been influenced by the reference to their need to be `safeguarded' in Policy SP1 rather than `enable and support'. PPG refers to Planning Practice Guidance states in preparing local plans the LPA has a legal duty to `have regard to' the relevant strategy for their area. <p>A key role of ECC is to maintain high quality infrastructure to support a growing economy and the delivery of new homes and</p>	<p>Housing Supply at April 2025 ECC recommend consideration is given to the phased delivery of supported and specialist housing as set out in the SSHANA. ECC require Criteria 1 is deleted. 1. The Infrastructure Delivery Plan identifies the infrastructure required to meet the demands of new development. ECC require Criteria 2 is amended to read: Where necessary, the Council will seek developers to make direct provision or provide proportionate contributions towards the provision of infrastructure required to make a development proposal</p>				<p>upon three growth scenarios and not the final housing strategy and sites set out in the Reg 19 consultation Plan. As a result EEC considers that CPBC has not met its duty to cooperate on this matter.</p> <p>Evidence that needs to be incorporated into the Plan and IDP includes; ECC Developers Guide to Infrastructure Contributions (Nov 2025), Castle Point LCWIP, Essex LCWIP July 2025 , Local Transport Plan July 2025 (including the South Essex Implementation Strategy (July 2025)), SSHANA July 2025 and the Shared Standards in Water Efficiency June 2025. ECC did not have the opportunity to review the West Canvey Addendum (Aug 2025) prior to the commencement of the Reg 19 consultation. This evidence has implications on the IDP May 2025 and ECC would need to do further assessment on the infrastructure impacts of the proposed housing strategy, as set out in the Reg 19 Plan.</p>	<p>Plan and its evidence will be decided at examination. It is agreed that CPBC and EEC have held regular meetings during the preparation of the local plan including sharing drafts of the Castle Point Plan for review. It is agreed that there has been additional evidence published since the preparation and publication of the IDP May 2025. Following feedback from the Reg 19 Consultation CPBC is updating some of its evidence base including the Transport Assessment and Infrastructure delivery Plan. The latest evidence and feedback will inform the proposed modifications to be submitted alongside the Plan. Prior to submission ECC</p>		

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											<p>communities. Achieving this requires ECC to ensure that development, planning and infrastructure delivery across the administrative county, is aligned. This is to ensure that the delivery of ECC's infrastructure and services are commensurate with the growth being planned. Such requirements cannot place an unaffordable cost burden on the public purse or require early intervention to retrofit or "make good".</p> <p>ECC has held regular meetings with CPBC with regards the preparation of the Plan in terms of general policy matters, the evidence base (including the Transport Assessment), early draft iterations of the Plan (including its policies) and the IDP. ECC provided formal responses to the Issues and Engagement and Issues and Options consultations. ECC has ensured that the Essex Planning Officers Association (EPOA) policies and evidence regarding net zero development have been included in the Plan, namely Policies SD4 and SD5, and further updates are provided as part of this consultation. ECC has ensured that the key messages from the EPOA Essex Parking Guidance, Local Transport Plan - A Better Connected Essex and water efficiency requirements have been incorporated into the Plan, although some amendments are still necessary.</p> <p>Whilst officer meetings have been held with ECC to discuss the emerging spatial strategy, its</p>	<p>acceptable in planning terms, in accordance with the tests set out in the National Planning Policy Framework (NPPF) and the provisions of the Community Infrastructure Levy Regulations and having regard to the provisions of the Infrastructure Delivery Plan.</p>				<p>There have been regular meetings between ECC and CPBC with regards the preparation of the Castle Point Plan and early drafts of the Plan have been shared with ECC.</p> <p>EPOA's net zero development and Essex Parking Guidance and Local Transport Plan have all been incorporated into the plan, although some amendments were still necessary.</p> <p>However, significant evidence has been completed post the preparation and publication of the IDP May 2025 and needs to be incorporated into an updated IDP. The IDP May 2025 is based upon three growth scenarios and not the final housing strategy and sites set out in the Reg 19 consultation Plan. As a result ECC considers that CPBC has not met its duty to cooperate on this matter.</p> <p>Evidence that needs to be incorporated into the Plan and IDP includes; ECC Developers Guide to Infrastructure</p>	<p>will be required to undertake a cumulative assessment of the infrastructure needs based on the proposed housing strategy set out in the Reg 19 Plan, namely 6,196 homes, particularly around primary, secondary and early years education and childcare and SEND, and the additional evidence. CPBC will provide ECC the updated Transport Assessment to review prior to submission of the Castle Point Plan for examination.</p> <p>The IDP will be updated to include all latest information and evidence for ECC review. Accepted amendment to table made. Noted Housing trajectories to consider the provision of</p>		

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											<p>implications with regards infrastructure requirements and the preparation of the IDP Baseline and IDP, May 2025, ECC considers that CPBC has not fully met its legal compliance with respect to the Duty to Cooperate</p> <p>Significant evidence base referenced in the Plan has been completed post the preparation of the IDP, May 2025, including significant evidence base referenced in the Plan has been completed post the preparation of the IDP (May 2025), including the updated ECC Developers' Guide to Infrastructure Contributions (September 2025); Castle Point LCWIP; Essex Wide LCWIP; Transport Assessment (July 2025) and West Canvey Addendum (August 2025); Local Transport Plan A Better Connected Essex Transport Strategy (July 2025) and South Essex Implementation Strategy (July 2025); Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025); ELRNS (July 2025); and Shared Standards in Water Efficiency (June 2025).</p> <p>The published IDP (May 2025) is not based on the infrastructure requirements required to deliver either Government's standard methodology housing requirements or the CPBC 6,196 homes, as set out in Policy SP3 but three growth scenarios ranging between 4,862 to 8,845 homes, including some development in the Green Belt. Whilst the strategy remains</p>						Contributions (Nov 2025), Castle Point LCWIP, Essex LCWIP July 2025 , Local Transport Plan July 2025 (including the South Essex Implementation Strategy (July 2025)), SSHANA July 2025 and the Shared Standards in Water Efficiency June 2025. ECC did not have the opportunity to review the West Canvey Addendum (Aug 2025) prior to the commencement of the Reg 19 consultation. This evidence has implications on the IDP May 2025 and ECC would need to do further assessment on the infrastructure impacts of the proposed housing strategy, as set out in the Reg 19 Plan. Prior to submission ECC will be required to undertake a cumulative assessment of the infrastructure needs based on the proposed housing strategy set out in the Reg 19 Plan, namely 6,196 homes, particularly around primary, secondary and early years education and childcare and SEND , and the additional evidence.	supported and specialist housing Accepted. Accepted and additional text added for clarity	

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											<p>'urban focussed' the allocated sites informing the IDP, May 2025 and site allocations in the Plan differ in terms of scale and their distribution. The Sustainability Appraisal, paragraph 28, bullet 1 infers that the plan policy position and Scenario 1 in the IDP are similar. In fact, there are significant differences in that some sites have been removed from the Plan and some 16 sites have been subject to significant change, which will impact on any infrastructure requirements. For example, West Canvey has increased from 1,000 to 2,700 homes (of which 700 post 2043) and Canvey Town Centre has increased from 200 to 820 homes.</p> <p>To demonstrate the implications, ECC, as the lead authority for Education, has undertaken a 'high-level' assessment of the Plan's growth on primary education and early years and childcare places (see Appendix 4). The assessment identifies the following changes in requirements:</p> <ul style="list-style-type: none"> • Consultation Plan – identifies the need for two 56 place early years and childcare nurseries and primary provision (non-defined). • ECC assessment – identifies the need for at least a new 2FE primary school; three new 72 place nurseries, of which one should be co-located with the primary school; one stand-alone 56 place nursery and potentially two further stand-alone 30 place nurseries subject to land being 						EEC reviewed the transport assessment scoping report prepared by the consultants Systra, but the completed TA and the West Canvey Addendum could only be reviewed as part of the consultation. ECC provided substantive comments on the TA and its Addendum as part of the consultation, which require to be addressed prior to submission and its impact on the Plan and supporting IDP. Requests an amendment to table title for consistency with monitoring position in Housing Topic Paper April 2025. Recommends that consideration should be given to the trajectory of supported and specialist housing within its housing strategy.		

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											<p>made available by developers. Prior to submission, ECC will need to undertake a cumulative assessment of the growth consistent with Section 3.4 of the Essex County Council Local and Neighbourhood Planners' Guide to School Organisation and Place Planning (September 2025) for education and early years and childcare. The assessment must be consistent with the updated ECC Developer's Guide for Infrastructure Contributions (September 2025) and reflecting the updated DfE Scorecard (Q1 2025) costs for education provision per place. ECC needs to ensure that the delivery of ECC's infrastructure and services are commensurate with the growth being planned. Such requirements cannot place an unaffordable cost burden on the public purse or require early intervention to retrofit or "make good".</p> <p>CPBC and its consultants Systra have held regular meetings with ECC with regards the preparation of the transportation evidence base. The TA Scoping Report was reviewed by ECC and considered an appropriate piece of evidence to support the Regulation 18 Consultation (Issues and Options – July – September 2024). However, ECC was not provided with the opportunity to comprehensively review the completed TA (including its Appendices) and the West Canvey Addendum (August 2025), with the latter published post commencement of the consultation. An update to the</p>												

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											<p>Transport Assessment (TA), Transport Assessment Addendum; and Green Belt Sites Assessment will be required to address the issues, observations and queries identified following the ECC review of these documents (see Appendix 5) and will subsequently inform an update to the IDP.</p> <p>ECC recommend the title of the housing supply table in paragraph 2 should be amended to 2025 to be consistent with the residential land monitoring position set out in the Housing Topic Paper of 1 April 2025.</p> <p>While the stepped housing trajectory in Policy SP3 is welcomed, consideration should be given to a trajectory for the provision of supported and specialist housing. Estimated need is set out in the SSHANA for the period up to 2029, 2034, 2039 and 2044. ECC recognises that delivery is often market-led, but the Plan could better demonstrate how it will support delivery over the plan period.</p> <p>As worded, Criteria 1 implies that contributions will only be made if the site is linked to an infrastructure item listed in the IDP. The IDP is a 'living document' and will change over time as more information is known regarding particular site requirements.</p> <p>The purpose of the policy should be to ensure that all sites (including windfalls) make an appropriate contribution towards the necessary infrastructure consistent with the statutory tests in regulation 122 (as</p>													

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											<p>amended by the 2011 and 2019 Regulations), namely necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.</p> <p>ECC generally supports the policy as it has been adapted to suit local circumstances from the ECC modal policy on 'Infrastructure Delivery and Impact Mitigation', which has been included in other adopted Local Plans in Essex.</p> <p>For clarity, criteria 2 should make it clear that a development can be made acceptable in planning terms through direct provision and/or proportionate contributions rather than only contributions.</p> <p>This amendment would be consistent with Strategic Policy SP2, criteria 3a which states:</p> <p>a. Provide or make a proportionate financial contribution to the delivery of necessary infrastructure alongside growth;</p> <p>And Policy Infra2, criteria 2 which states:</p> <p>2. Where a development proposal, either individually or cumulatively, increases demand for education facilities beyond those available within the local area, development will be required to provide land for a new educational facility, expand or alter an existing facility and/or make a proportionate contribution to fund necessary improvements to education facilities.</p>													

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0282005	Organisation	Kevin	Fraser	Essex County Council	Yes	SP4	No		No	Effective	<p>As worded, Criteria 1 implies that contributions will only be made if the site is linked to an infrastructure item listed in the IDP. The IDP is a 'living document' and will change over time as more information is known regarding particular site requirements.</p> <p>The purpose of the policy should be to ensure that all sites (including windfalls) make an appropriate contribution towards the necessary infrastructure consistent with the statutory tests in regulation 122 (as amended by the 2011 and 2019 Regulations), namely necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.</p> <p>ECC generally supports the policy as it has been adapted to suit local circumstances from the ECC modal policy on 'Infrastructure Delivery and Impact Mitigation', which has been included in other adopted Local Plans in Essex.</p> <p>For clarity, criteria 2 should make it clear that a development can be made acceptable in planning terms through direct provision and/or proportionate contributions rather than only contributions.</p> <p>This amendment would be consistent with Strategic Policy SP2, criteria 3a which states:</p> <ul style="list-style-type: none"> • Provide or make a proportionate financial 	<p>Criteria 1 is deleted</p> <p>The Infrastructure Delivery Plan identifies the infrastructure required to meet the demands of new development.</p> <p>Delete text for Criteria 2 and replace with: Where necessary, the Council will seek developers to make direct provision or provide proportionate contributions towards the provision of infrastructure required to make a development proposal acceptable in planning terms, in accordance with the tests set out in the National Planning Policy Framework (NPPF) and the provisions of the Community Infrastructure Levy</p>				<p>The Infrastructure Delivery Plan is a living document, and appropriate contributions are required if infrastructure needs relevant to any particular site have been identified. Further clarity is required to SP4 policy.</p> <p>Supports this policy, but greater clarity in criteria requiring that developers make direct provision and/or proportionate contributions towards infrastructure needs.</p>	Accepted. Accepted and additional text added for clarity	<p>1. The Infrastructure Delivery Plan identifies the infrastructure required to meet the demands of new development.</p> <p>2. Where necessary, the Council will seek developers to make direct provision or provide proportionate contributions towards the provision of infrastructure required to make a development proposal acceptable in planning terms, in accordance</p>	

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											<p>contribution to the delivery of necessary infrastructure alongside growth;</p> <p>And Policy Infra2, criteria 2 which states: 2. Where a development proposal, either individually or cumulatively, increases demand for education facilities beyond those available within the local area, development will be required to provide land for a new educational facility, expand or alter an existing facility and/or make a proportionate contribution to fund necessary improvements to education facilities.</p>	<p>Regulations and having regard to the provisions of the Infrastructure Delivery Plan. Proposals for any development must demonstrate that the required infrastructure to support the development will be delivered in a timely, and where appropriate, phased manner.</p>							<p>ce with the tests set out in the National Planning Policy Framework (NPPF) and the provisions of the Community Infrastructure Levy Regulations and having regard to the provisions of the Infrastructure Delivery Plan. Proposals for any development must demonstrate that the required infrastructure to support the development will be delivered in a timely, and</p>

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																			where appropriate, phased manner.
02820006	Organisation	Kevin	Frasier	Essex County Council	Yes	C1	Not Stated		No	Effective	ECC welcome the encouragement of opportunities for greening the town centre in criteria 10. However, the reasoned justification should be strengthened by demonstrating how this will be achieved. The greening of town centres can enhance public spaces, improve biodiversity, and support climate resilience through greening streets, creating attractive and welcoming town squares, and integrating multifunctional green infrastructure into new developments. The reasoned justification could refer to the Nature Towns and Cities accreditation launched in 2025 (https://naturetownsandcities.org.uk/). By 2035, the goal is for 5 million more people to have easy access to nature and green spaces, and for 1 million more children to grow and play in greener environments. https://naturetownsandcities.org.uk/ .3. Effective ECC welcome the encouragement of opportunities	The reasoned justification could make reference to the Nature Towns and Cities accreditation launched in 2025 (https://naturetownsandcities.org.uk/). ECC require an amendment to paragraph 8.20 to read: `....The Paddocks site will be re-imagined as a lively community hub as part of a high quality mixed use development better connected to the town	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Supports policy suggests adding a reference to Nature Towns and Cities within the justification Supports policy to provide access to high quality safe and convenient walking and cycling routes within Canvey Town Centre Supports reference to The Paddock as a community and cultural asset on Canvey Island. There are opportunities for it to support skills development in the community	Accepted and reference added Add sentence to 8.13. There will be a need for local access to open spaces as well as space for visitors. There is also an opportunity to provide landscaping, green space and nature improvements for the benefit of residents and wildlife useful guidance can be found in Home - Nature Towns & Cities. Where there are opportunities to provide flexible... Officer additional text	14. Development proposals must satisfy the requirements of the habitats regulations and must be designed to protect and enhance enable and support the habitat priority measures identified within the Strategic Opportunities set out in the

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											<p>for greening the town centre in criteria 11. However, the reasoned justification should be strengthened by demonstrating how this will be achieved. The greening of town centres can enhance public spaces, improve biodiversity, and support climate resilience through greening streets, creating attractive and welcoming town squares, and integrating multifunctional green infrastructure into new developments.</p> <p>The reasoned justification could refer to the Nature Towns and Cities accreditation launched in 2025 (https://naturetownsandcities.org.uk/). By 2035, the goal is for 5 million more people to have easy access to nature and green spaces, and for 1 million more children to grow and play in greener environments. https://naturetownsandcities.org.uk/</p> <p>ECC support reference to The Paddock as a community and cultural asset of Canvey Island. Reference could also be made to any opportunities for it to support skills development of the local community, where 43% of working age residents are low skilled compared to 31% for Essex (ONS 2021)</p>	<p>centre, which could support skills development of the local community . ECC require paragraph 8.22 is amended to read:</p> <p>There is scope within this area to increase tourism activities, including access to Thorney Bay Pavillion, through some additional business growth in the leisure and food and drink offer, and through the utilisation of public spaces including the park, the bandstand, and the beach.</p>							added to 8.17 Redevelopment of Canvey Town Centre also provides opportunities for landscaping and biodiversity improvements to this area to create attractive green spaces and planting for residents to enjoy No Mods Amend final sentence to 8.20 read:The Paddocks site will be re-imagined as a lively community hub as part of a high quality mixed use development better connected to the town centre, which could support skills development of the local community .munity	Essex Local Nature Recovery Strategy (LNRS). (Para 8.17) There will be a need for local access to open spaces as well as space for visitors. There is also an opportunity to provide landscaping, green space and nature improvements for the benefit of residents and wildlife useful guidance can be found in Home - Nature Towns & Cities. Where there are opportuni

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																			ties to provide flexible... (Para 8.20) ... to the town centre from the north and east. Redevelopment of Canvey Town Centre also provides opportunities for landscaping and biodiversity improvements to this area to create attractive green spaces and planting for residents to enjoy. :The Paddocks site will be re-imagined as a lively community hub as part of a

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																			<p>high quality mixed use development better connected to the town centre, which could support skills development of the local community.</p> <p>(Para 8.22) There is scope within this area to increase tourism activities, including access to Thorney Bay Pavillion, through some additional business growth in the leisure and food and drink offer, and through</p>

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																			the utilisation of public spaces including the park, the bandstand, and the beach.
02820007	Organisation	Kevin	Frasier	Essex County Council	Yes	C1	Not Stated		Yes		ECC welcome reference to future business growth and increases in tourism activities. Reference to Thorney Bay Pavillion as an asset in terms increasing tourism and attracting future business growth.		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Supports policy to provide access to high quality safe and convenient walking and cycling routes within Canvey Town Centre Supports reference to The Paddock as a community and cultural asset on Canvey Island. There are opportunities for it to support skills development in the community Supports policy suggests to add reference to Thorney Bay as an asset for increasing tourism and business growth.	Noted Accepted CPBC agrees that the Paddocks can provide opportunities to support skills development in the community Accepted CPBC agrees that Thorney Bay Pavillion can be an asset for increasing tourism and supporting business growth.	
02820008	Organisation	Kevin	Frasier	Essex County Council	Yes	C1			Yes		Reference to providing access to high quality safe and convenient, walking and cycling networks to ensure access is provided for town centre residents to access the lake, coastal areas, and larger open spaces is supported. Reference to active travel routes and shuttle buses to employment sites both on Canvey Island and in neighbouring economic centres, as well as to travel links (Benfleet		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing	B	Supports policy. Suggests adding a reference to https://naturetownsandcities.org.uk/ as this would further strengthen this policy by demonstrating how this could be achieved.	Accepted and put reference to https://naturetownsandcities.org.uk/ in the justification at paragraph 8.13	

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											train station) would be supported if feasible, which would increase access to employment sites and off-Island learning provision.				ng various pieces of evidence				
0282009	Organisation	Kevin	Fraser	Essex County Council	Yes	C3	Yes		No	Effective	ECC support Criteria e requiring any substantive redevelopment, a change of use or change of materials handled being made in accordance with the requirements of Policy ENV3 and SD1		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Supports policy that redevelopment and change of use or materials should be made in accordance with policies ENV3 and SD1	Noted:	
0282010	Organisation	Kevin	Fraser	Essex County Council	Yes	C4	Not Stated		No	Positively prepared, justified, effective	1. Positively Prepared 2. Justified 3. Effective Please refer to the response to Policy Infra2 – Education, Skills and Learning, paragraph 19.20 with regards the `soundness' of the Plan in education and Policy T1 in transportation terms. With regards Policy C4- West Canvey, this was previously assessed in education terms for 1,000 homes as highlighted in the IDP, May 2025. ECC indicated that a new primary	ECC will need to undertake a cumulative assessment of the growth, prior to submission, consistent with Section 3.4 of the Essex County Council Local and Neighbourhood Planners' Guide to School Organisation	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces	B	Education Needs were assessed based on a lower number of housing at West Canvey, as highlighted in the IDP May 2025. A further assessment using the latest housing strategy is required to assess the impact of growth at West Canvey on primary, secondary, early years education and childcare and SEND provision for 2,700 homes at West Canvey and this policy	Accepted. CPBC will work with ECC to undertake a further assessment to identify the necessary primary, secondary, early years education and childcare and SEND provision for West Canvey and this policy	Remove criteria 8 and replace with A new 72 56 place stand-alone early years and childcare nursery (Use Class E(f)) on 0.22 0-13

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											<p>school may be required along with a 56 and 30 place nursery. The policy has increased to 2,700 homes (of which 700 are beyond 2043) with only a requirement for a new 56 place stand-alone early years and childcare nursery and additional primary school provision as required. No specific land is allocated for a new school (F1) use. However, the provision of 2,700 homes will require at least a new 2FE primary school with the provision of land and contributions towards three new 72 place nurseries, of which one should be co-located with the primary school (see Appendix 4). ECC support the requirement for a masterplan, approved by CPBC, to be in place prior to the submission of a planning application. Masterplans should encourage a landscape-led approach to design to ensure that GBI, biodiversity, and climate resilience, and the ELNRS are considered from the outset, shaping development around the natural environment rather than retrofitting it. ECC support the promotion of urban greening in criteria 3 and 9 and the delivery and connection to GI to the west of the site. ECC support reference in Criteria 10, to requirements for development design to support the habitat priority measures identified in the Strategic Combined Opportunity Areas but recommend an amendment to reflect the correct terminology Should reference also be made to protecting areas identified as</p>	<p>and Place Planning (February 2025) to inform an updated IDP. Any cumulative assessment will need to inform the Plan, site policies, an amended IDP and Whole Plan Viability Assessment. ECC needs to ensure that the delivery of ECC's infrastructure and services are commensurate with the growth being planned. Further assessment will be undertaken to support individual planning applications once the detailed housing mix has been determined by the developer. ECC require Criteria 10 is amended to read: Development proposals must</p>			es of evidence		<p>housing of 2,700 homes set out in the policy. Supports the requirement to provide masterplans prior to submission of planning application. Proposes landscape led design approach to master planning with early on consideration of ELNRS. Supports promotion of urban greening within the policy. Suggests referencing the protection of APIBs to be consistent with Policy SP1.</p>	<p>and the IDP will be updated according to the results of that assessment. In January 2026, ECC provided addendums to the education assessments previously undertaken in November 2025. Accepted. GBI, biodiversity and climate change should be considered at the outset of any development design. Additional reference to 'protect and enhance' Strategic Combined Opportunity Areas' consistent with proposed change to Policy SP1 and to 'protect' APIBs</p>	<p>hectares of suitable land and a new 56 place stand-alone early years and childcare nursery (Use Class E(f)) on 0.18 hectares of suitable land allocated for education and childcare use provision Amend Criteria 10 to read: Development proposals must be designed to protect and enhance enable and support the habitat priority</p>

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											Areas of Particular Importance for Biodiversity (APIBs) consistent with Policy SP1, if there are such sites at this location.	be designed to enable and support the habitat priority measures identified within the Strategic Combined Opportunity Areas Opportunities set out in the Essex Local Nature Recovery Strategy (ELNRS).							measures identified within the Strategic Combined Opportunity Areas Opportunities as well as protect Areas of Biodiversity Importance set out in the Essex Local Nature Recovery Strategy (ELNRS).
0282-0011	Organisation	Kevin	Fraser	Essex County Council	Yes	C5	Not Stated		Yes		ECC welcome reference in Criteria 2 and paragraph 8.50 to ECC, as Highway and Transportation Authority, being required to be directly involved in the scoping and undertaking of any feasibility study regarding improved access to and around Canvey Island. ECC is currently consulting on a new Local Transport Plan - 'A Better Connected Essex'. The South Essex Implementation Plan Appendix A identifies ideas of projects at a snapshot in time but which have not been subject to feasibility or have any funding. Relevant scheme ideas include: • Canvey Access Improvement to enhance connectivity to and from the island by all modes of	ECC welcome reference to ECC being a potential partner in any future feasibility project to improve access to Canvey Island as this is consistent with the emerging LTP4 and South Essex Implementation Plan.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	EEC welcomes its proposed involvement in any future Canvey Island improved access feasibility study. The emerging Local Transport Plan includes scheme ideas for improving access to Canvey Island, have not been subject to feasibility or have any funding.	Noted:	

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											transport to improve sustainable access and ease traffic congestion. This would improve access to services, health and wellbeing, and access to employment. <ul style="list-style-type: none"> Improved links from Canvey to Thames Freeport to improve access between Canvey Island and Thames Freeport to connect people to jobs and address high levels of deprivation. This would improve access to services, health and wellbeing, and access to employment. Castle Point walking and cycling improvements (LCWIP) - Route Number 10 - Connects Canvey Town Centre to Benfleet Station utilising the bridge at Canvey Road, Somnes Avenue, Central Wall Road and Knightswick Road. 									
02820012	Organisation	Kevin	Fras er	Essex County Council	Yes	C8	Not Stated		No	Effective	ECC welcomes reference in paragraph 8.70 that any redevelopment of these sites must capture any change in likely infrastructure demand, in particular the new demand on school places compared to the current typically older residents. Any new housing would be deemed `windfall` development. Any cumulative assessment undertaken consistent with Section 3.4 of the Essex County Council Local and Neighbourhood Planners' Guide to School Organisation and Place Planning (February 2025) would not be able to consider the impact of this potential growth alongside the 675 homes arising from other windfall. Consequently, any cumulative assessment would help establish		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Any development at Residential Park Home Sites would require to be included in cumulative assessment for primary education and early years provision.	Noted. CPBC will work with ECC to undertake a further cumulative assessment to identify the necessary primary, secondary, early years education and childcare and SEND requirements including any impact arising from re-development from the Residential Park Home Sites. In January 2026,	e. Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex	

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											any headroom in existing schools once Plan growth has been accounted for.							ECC provided addendums to the education assessments previously undertaken in November 2025.	Local Nature Recovery Strategy (LNRS).
0282-0013	Organisation	Kevin	Fraser	Essex County Council	Yes	B1	Not Stated		No	Not Stated	ECC seek an additional criteria to make reference to greening the town centre and providing biodiversity net gain at street level and above consistent with Policy C1, criteria 10.	ECC require an additional Criteria to read: Opportunities for greening the town centre and providing biodiversity net gain at street level and above	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Require additional criteria to reference greening town centre and providing biodiversity net gain	Accepted and additional criteria added to policy	4. Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS). 5. Opportunities for greening the town centre and providing biodiversity net

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																			gain at street level and above
02820014	Organisation	Kevin	Frasier	Essex County Council	Yes	B2	Not Stated		No	Effective	ECC seek an additional criteria to make reference to greening the town centre and providing biodiversity net gain at street level and above consistent with Policy C1, criteria 10. ECC welcome reference to the topography as being a potential barrier to active travel use from Benfleet Station to the north east such as Thundersley and Hadleigh, in particular with regards Route 12 in the LCWIP connecting from Benfleet Station to Hadleigh town centre, utilising the trails through Benfleet Down and Hadleigh Country Park. Paragraph 9.9 refers to the transport modelling for the Plan indicating a number of listed transport improvements in Benfleet. Further work will be required to ascertain how this relate, can be funded and delivered by particular development sites/clusters. ECC seek reference should also be made to the provision of a mobility hub at Benfleet Station consistent with Policies T1, Criteria 5 and T4, Criteria 6.	ECC require an additional Criteria to read: Opportunities for greening the town centre and providing biodiversity net gain at street level and above This will need to be considered when considering how the Schedule of Interventions relate to specific development sites and/or clusters to feed into any future update to the IDP. ECC seek paragraph 9.9 includes an additional travel outcome to read: Create a mobility hub at Benfleet Station	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Require additional criteria to reference greening town centre and providing biodiversity net gain The Topography in Benfleet is a potential barrier to active travel use from Benfleet Station to the Northeast towards Thundersley and Hadleigh and would require further consideration to feed into how the Schedule of Interventions relate to specific development sites and/or clusters to feed into any future update to the IDP. Transport improvements in Benfleet will require further assessment to ascertain how they relate to development coming forward and how they would be delivered to development funded. Provision of a mobility hub at Benfleet Station should be included in the criteria	Noted Accepted. Further work would be required through the planning process. Reference made to the provision of a mobility hub at Benfleet Station	5. Opportunities for greening the town centre and providing biodiversity net gain at street level and above

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02820015	Organisation	Kevin	Fraser	Essex County Council	Yes	B6	Not Stated		No	Effective	ECC notes that the site allocation is within a Waste Consultation Area in relation to a waste site on Armstrong Road (ref ESS/37/18/CPT). It is requested that this is reflected in the text of the policy and includes reference to the need for a Waste Infrastructure Impact Assessment as part of any subsequent application. ECC notes that the site allocation is within a Waste Consultation Area in relation to a waste site on Armstrong Road (ref ESS/37/18/CPT). It is requested that this is reflected in the text of the policy and includes reference to the need for a Waste Infrastructure Impact Assessment as part of any subsequent application.	ECC require an additional Criteria to read: Undertake a Waste Infrastructure Impact Assessment ECC require the reasoned justification is amended to read: The site is located within a Waste Consultation Area regarding the waste site at Armstrong Road. As a result, a Waste Infrastructure Impact Assessment should be undertaken.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	The site is within a Waste Consultation Area at Armstrong Road and a Waste Infrastructure Impact Assessment would be required. This should be referenced in the policy The site is within a Waste Consultation Area at Armstrong Road and a Waste Infrastructure Impact Assessment would be required. This should be referenced in the reasoned justification	Accepted and additional text added requiring a Waste Infrastructure Impact Assessment Accepted and additional text added requiring a Waste Infrastructure Impact Assessment in the reasoned justification	Add additional Criteria 5. A Waste Infrastructure Impact Assessment is undertaken given the site is located within a Waste Consultation Area in relation to the waste site on Armstrong Road. See above additional criteria added ECC require the reasoned justification is amended to read: The site is located within a Waste Consultation Area

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																			regarding the waste site at Armstrong Road. As a result, a Waste Infrastructure Impact Assessment should be undertaken
02820016	Organisation	Kevin	Fras er	Essex County Council	Yes	B8	Not Stated		No	Effective	ECC seek Criteria 4 also makes reference to providing biodiversity net gain to be consistent with other plan policies.	ECC require Criteria 4 is amended to read: Improved public realm which creates space for pedestrians and cyclists to move around. The public realm strategy should integrate urban greening, biodiversity net gain and incorporate sustainable drainage into the approach to materials and landscaping.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Reference should be made to providing biodiversity net gain for this policy	Accepted and additional text added requiring biodiversity net gain	4. Improved public realm which creates space for pedestrians and cyclists to move around. The public realm strategy should integrate urban greening, biodiversity net gain and incorporate sustainable drainage into the approach

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																			to materials and landscaping 8. Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).
02820017	Organisation	Kevin	Fraser	Essex County Council	Yes	Had 1	Not Stated		Yes		ECC support reference to opportunities for urban greening in the town centre (Criteria 8). Town centres present a valuable opportunity for urban greening, which can enhance public spaces, improve biodiversity, and support climate resilience. This could include greening streets, creating attractive and welcoming town squares, and integrating green infrastructure		Yes	Not Stated	Yes, ECC supplied 8 additional appendices cont	B	EEC supports this policy and reference to opportunities for urban greening in Hadleigh Town Centre	Accepted and additional text referring to urban greening added	Improved environmental conditions including urban greening can help the attractiveness of

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											into new developments. Further, supporting justification could be provided in the reasoned justification outlining how this will be delivered, consistent with paragraph 18.32				aining various pieces of evidence				the centre town centre along with an improved evening and leisure offer. Useful guidance can be found in Home - Nature Towns & Cities. A banking hub is also desired to enable residents and local businesses to have access to shared banking services.
02820018	Organisation	Kevin	Frasier	Essex County Council	Yes	Had 1	Not Stated		No	Effective	To provide consistency with other policies in the Plan and to ensure that any masterplan has regard to the guidance and standards set out in the EPOA Parking Guidance.	ECC require Criteria 6 is amended to read: A car parking strategy that provides the level of car parking required to meet foreseen demand and accessibility between	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing	B	Masterplan of this site should have regard for the EPOA Parking Guidance for this policy	Accepted and additional text added to reference EPOA Parking Guidance	6. A car parking strategy that provides the level of car parking required to meet foreseen demand and accessibi

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												commercial areas and car parking having regard to the EPOA Parking Guidance.			various pieces of evidence				lity between commercial areas and car parking having regard to the EPOA Parking Guidance . 11. Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).
028200	Organisation	Kevin	Fraser	Essex County Council	Yes	Had 2	Not Stated		Yes		ECC welcome reference to support proposals related to the improvement of recreational facilities within the Country Park and its maintenance. This is supported by Policy Infra4 –		Yes	Not Stated	Yes, ECC supplied 8 addi	B	Supports policy for requiring proposals to improve recreational facilities at Hadleigh Country Park and their maintenance	Noted	Develop ment proposals must be designed to protect

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19											Open Spaces, Criteria 5 which requires major development to make a contribution towards improving the quality, quantity and/or accessibility of nearby open space provision, recognising the impact increased intensity of use may have on that space. ECC consider this is relevant to Hadleigh Country Park in order to mitigate the intensification if uses from development. Development proposals must give consideration to the impact on ECCs Country Parks, including Hadleigh Country Park, and seek to secure infrastructure and/or environmental mitigation as may be set out in appropriate management plans for these Parks. Consideration should also ensure that consideration is given to accessibility to, and within, Country Parks by active and sustainable travel modes, and funding is provided for their longer term maintenance and lifecycle replacement consistent with Policy T3.				tonal appendices containing various pieces of evidence		consistent with other policies in the Plan.		and enhance enable and support
0282020	Organisation	Kevin	Fraser	Essex County Council	Yes	Had 4	Not Stated		No	Effective	ECC notes the policy states that proposals must comply with all other relevant policies in the Plan. However, ECC recommended that developments are required to demonstrate the delivery of multifunctional GBI and biodiversity net gain to ensure their integration into development design and delivery.	ECC require an additional Criteria to read: Opportunities for providing multifunctional green infrastructure and biodiversity net gain	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various	B	Recommends adding an additional criteria that developments required to demonstrate delivery of multifunctional GI and BNG	Accepted and additional criteria added to policy to require developments to demonstrate the delivery of multifunctional GI and BNG	Provides opportunities for multifunctional green infrastructure and biodiversity net gain

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															pieces of evidence				
028200221	Organisation	Kevin	Frasier	Essex County Council	Yes	Thun 1	Not Stated		No	Effective	ECC seek an additional Criteria is included referencing the need for urban greening and biodiversity net gain consistent with Policy C1, criteria 10.	ECC require an additional Criteria to read: Opportunities for greening the centre and providing biodiversity of net gain at street level and above.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Recommends additional criteria to policy to reference urban greening and BNG	Accepted and additional text referring to urban greening added	Add an additional criteria to read Provides opportunities for greening the centre and biodiversity of net gain at street level and above.
028200222	Organisation	Kevin	Frasier	Essex County Council	Yes	Thun 2	Not Stated		Yes		ECC notes that the land proposed for allocation at Kiln Road comprises a significant re-development of a brownfield site which is currently home to USP College. It is recommended that officers ensure master plan proposals for Kiln Road prioritise the preservation of the USP college and its educational and recreational offerings after or during the development of the new campus.	ECC would welcome opportunities for further discussions on to ensure the site is able to come forward in a way that is environmentally, economically and socially sustainable	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	The redevelopment of Kiln Road should ensure that preservation of USP college facilities on or offsite is prioritised during the masterplan process. ECC Welcome involvement in the master planning of the site	Accepted. CPBC will work with all stakeholders to ensure that the educational and recreational facilities are preserved for the community.	

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02820023	Organisation	Kevin	Fraser	Essex County Council	Yes	Thun 2	Not Stated		No	Effective	<p>Prior to submission, ECC will need to undertake a cumulative assessment of the growth consistent with Section 3.4 of the Essex County Council Local and Neighbourhood Planners' Guide to School Organisation and Place Planning (September 2025) for education and early years and childcare. The assessment must be consistent with the updated ECC Developer's Guide for Infrastructure Contributions (September 2025) and reflecting the updated DfE Scorecard (Q1 2025) costs for education provision per place. This will confirm the potential requirement for a new 56 place nursery to meet local demand. ECC needs to ensure that the delivery of ECC's infrastructure and services are commensurate with the growth being planned. Such requirements cannot place an unaffordable cost burden on the public purse or require early intervention to retrofit or "make good". Paragraph 11.16 highlights that parts of the site experience surface water challenges. Consequently, it is essential that any masterplanning of the site is undertaken in accordance with Policy SD3 – Sustainable Drainage Systems (SuDS) including incorporating water management measures to reduce surface water run-off and</p>	<p>ECC require Requirement 2 is amended to read: A new 56 place stand alone early years and childcare nursery (Use Class E(f)) on 0.183 hectares of suitable land allocated for education use ECC require a new Criteria to read: How SuDS will be incorporated into the masterplanning of the site in accordance with Policy SD3 ECC require an additional criteria to read: Opportunities for greening the centre and providing biodiversity of net gain at street level and above.</p>	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	<p>A further cumulative assessment is recommended to assess the early years provision requirement as a result of development at Kiln Road An additional criteria should be added to ensure that sustainable drainage systems are included in the master planning due to potential for surface water challenges Supports requirement for a masterplan that should be approved by CPBC prior to submission of planning application. The design of the scheme should be landscape-led to ensure GBI and BNG are integrated into the design from the onset.</p>	<p>Accepted. CPBC will work with ECC to undertake a further cumulative assessment to identify the necessary primary, secondary, early years education and childcare and SEND requirements including any requirements on the development proposals at Kiln Road Campus. In January 2026, ECC provided addendums to the education assessments previously undertaken in November 2025. Accepted an additional criteria has been added to require SuDS to be considered as part of the master plan process for the site. Accepted. Agreed that scheme designs</p>	<p>Amend criteria 2 to read A new 56 place stand alone early years and childcare nursery on 0.13 hectares (Use Class E(f)) on 0.18 hectares of suitable land allocated for education use Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified</p>

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											the submission of a drainage strategy to demonstrate how both on and off-site flood risk will be managed and mitigation measures should be satisfactorily integrated into the design and layout of the development. ECC support the requirement for a masterplan, approved by CPBC, to be in place prior to the submission of a planning application. Masterplans should encourage a landscape-led approach to design to ensure that GBI, biodiversity, and climate resilience, and the ELNRS are considered from the outset, shaping development around the natural environment rather than retrofitting it. For clarity, an additional criteria should be added requiring developments to demonstrate the delivery of GBI and BNG. This ensures that environmental enhancements are not just implied but actively integrated into the design and delivery of development.									should be landscape led and masterplans should be approved by CPBC prior to submission of the planning application. Given additional criteria 9 and 10 existing criteria 9 is amended to criteria 11.	within Strategic Opportunities set out the Essex Local Nature Recovery Strategy (LNRS) Proposals should demonstrate how SuDS will be incorporated into the master planning of the site in accordance with Policy SD3 Provide opportunities for greening the centre and biodiversity of net gain at street level and above
0282-0	Organisation	Kevin	Fraser	Essex County	Yes	Thun 4	Not Stated		Yes		ECC support the principle of this policy in seeking to secure green spaces as part of the GI network. ECC seeks further clarification as to whether the site has been or		Yes	Not Stated	Yes, ECC supplied 8	B	Clarification whether any biodiversity offsetting will be registered on the	Any Biodiversity Gain Offsite Opportunities will be registered on the			

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024				Council							will be registered on the Biodiversity Gain Site Register, which is a requirement before any credits can be sold or the LPA accepts contributions from a developer for off-site gains. Registration ensures the site is publicly recorded, has the necessary legal agreements and management plans are in place, and that it is secured for the minimum 30-year duration of the net gain.				additional appendices containing various pieces of evidence		Biodiversity Gain Site Register	Biodiversity Gain Site Register.	
028-0025	Organisation	Kevin	Fraser	Essex County Council	Yes	Hou4	Not Stated		Yes		ECC support the amendments to Policy Hou4 since the Regulation 18 consultation which align with the Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025)., namely: <ul style="list-style-type: none"> • Criteria 1a - 100% of all new homes will be built to standard M4(2) and Part 1b - 10% of all new homes will be built to standard M4(3) which supports inclusive and adaptable housing; and • Criteria 2c – requiring specialist housing to be located in areas with good access to shops and services and a placement preference for Essex residents, which supports local access for vulnerable adults. • Criteria 2d – a condition will be attached to the grant of permission giving placement preference to Essex residents. ECC notes that supported housing schemes for children in care and vulnerable adults are typically small-scale and 		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Supports Policy Hou4 which aligns with Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA 2025)	Noted	2a. Proposals that contribute towards the delivery of 1,056 retirement/ sheltered homes and 594 extra care units for older people which should have regard to the Essex Supported and Specialist Housing and Accommodation Needs

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											integrated within wider developments. Due to market pressures, local access to such accommodation can be constrained, resulting in placements outside the borough. ECC therefore supports policy mechanisms that prioritise local access to supported housing, enabling children and adults to remain close to family, education, and care networks. This aligns with ECC's statutory duties under the Children Act 1989 and Care Act 2014, and supports the delivery of inclusive, community-based care.									Assessment (2025) and provide mixed tenure of market and affordable/social rental over the Plan period in locations with good access to shops and services. Development proposals for extra care accommodation should refer to the ECC Extra Care Design Guide (2023) and ECC Market Position Statement in their designs.

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02820026	Organisation	Kevin	Fraser	Essex County Council	Yes	Hou4	Not Stated		No	Effective	<p>ECC support the amendments to Criteria 2a since the Regulation 18 consultation which align with the Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025)., namely:</p> <ul style="list-style-type: none"> Part 2a – reference to quantified targets for 1,056 retirement/sheltered homes and 594 extra care units for older people; <p>However, the following concerns raised in the Regulation 18 Plan still need to be addressed, namely:</p> <ul style="list-style-type: none"> Tenure split: Policy Hou4 2a does not distinguish between market and affordable/social rent provision. The SSHANA (2025) identifies a clear need for both, and ECC recommends that the policy reflects this to ensure balanced delivery. <p>ECC support the amendments to Policy Hou4 since the Regulation 18 consultation which align with the Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025)., namely:</p> <ul style="list-style-type: none"> Part 2b - reference to quantified targets for 138 residential care beds, and 139 nursing care beds; ECC welcome reference to the Essex Supported and Specialist Housing Needs Assessment 2025 in paragraphs 13.34, 13.37 and 13.39, although reference should also be made to the Reference should be made to the Supported and Specialist Housing Needs Assessment (May 2025) which covers people 	<p>ECC requires the following amendment to ensure it is consistent with national policy and ECC’s statutory duties.</p> <p>Amend Part 2a to specify the market/affordable social rent tenure split for retirement and extra care housing, as evidenced in the SSHANA (2025).</p> <p>ECC requires the following amendment to Criteria 2b ensure it is consistent with national policy and ECC’s statutory duties and to reflect the SSHANA (2025) figures. Proposals that contribute towards the delivery of 138 residential carebeds and 139 extra nursing care beds over the Plan period. ECC require the evidence base supporting this</p>	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	<p>Supports Policy HOU4 Specialist Housing Requirements but the policy needs to distinguish between market and affordable/social rent provision in criteria 2a for HOU4</p> <p>Need to reference the Supported Specialist Housing Needs Assessment (May 2025) when considering Castle Point’s housing needs</p> <p>Supports Policy Hou4 requires clarification on term nursing care beds to align with SSHANA</p>	<p>An update to the SSHANA (2025) was provided in December 2025, post the Regulation 19 consultation, setting out the tenure split between market and affordable/social rent for retirement/sheltered homes and extra care units for older people The previously published SSHANA did not clearly set out the tenure split and has not been scrutinised or viability tested as part of the Plan viability assessment.. It is required that future development proposals should have regard to the tenure requirements set out in the SSHANA within their planning application process. These requirements are:</p>	

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											with a learning disability, including young people with learning disability/autism; Autistic people; Vulnerable young people including care leavers; Children in Care; People with mental health needs; People with a physical/sensory disability, including wheelchair users ; Victims, survivors and perpetrators of domestic abuse; Older people (65+), ; and People with lower-level needs who may not draw on adult social care from Essex County Council but have support needs that affect their housing and/or accommodation.	policy should also refer to the ECC Extra Care Design Guide (2023) and ECC Market Position Statement (2023).							<ul style="list-style-type: none"> Retirement /sheltered housing (1056 homes) of which 802 are market housing and 253 affordable/social housing Extra care housing (594 homes) of which 421 homes are market housing and 173 homes are affordable/social housing <p>Accepted wording changed from extra care beds to nursing care beds Accepted references to ECC Extra Care Design Guide (2023) and ECC Market Position Statement (2023) added Accepted and referenced made to SHHANA (2025)</p>	
02820027	Organisation	Kevin	Frasier	Essex County Council	Yes	Hou6	Not Stated		Yes		ECC supports the approach to meeting identified needs for additional Gypsy and Traveller accommodation. Ongoing collaborative work on Gypsy and Traveller accommodation across Essex, through the EPOA and other strategic planning groups is recommended. Furthermore, it is important for		Yes	Not Stated	Yes, ECC supplied 8 additional appendi	B	EEC supports approach to meeting Gypsy and Traveller Accommodation in Castle Point	Noted. CPBC will continue to collaborate with neighbouring authorities through EPOA to identify the need for a transit site.		

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											the borough to continue to engage with the ongoing EPOA programme of work to identify the need for a transit site within Essex, with any outcomes of this work factored into reviews of the Plan.				ces containi ng vari ous piec es of evid enc e				
02820028	Organisation	Kevin	Fraser	Essex County Council	Yes	E1	Not Stated		No	Effective	ECC seek masterplans should be 'approved' rather than 'agreed' by the council prior to the determination of any planning application, and should set out the development principles and supporting evidence. An approved masterplan will accord significant weight in the determination of planning applications by CPBC. This is consistent with Policy D3 - Master Planning, criteria 1 which states: Where this Plan requires the use of Master Plans for allocated sites, these will be approved by the Council in advance of the determination of any planning application. Reference should be made to the Essex and Thurrock Local Skills Improvement Plan (2023) which identifies key skills gaps and identifies key priorities to be delivered through partnerships between employers, training providers, and local authorities to meet the evolving needs of the local economy.	ECC require Criteria 2 is amended to read: Within Strategic Employment Areas, and until such time as a Master Plan is approved ECC require the following addition to the Reasoned Justification to read: The Essex and Thurrock Local Skills Improvement Plan (2023) identifies key skills gaps and aims to create a more flexible, responsive education and training system. Key priorities include boosting soft skills,	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Masterplans should be approved by the council prior to determination of any planning application Add the Experian Land Demand Forecast for Castle Point September 2024 to the evidence base	Accepted CPBC agree that masterplans should be approved prior to any planning application Accepted reference added	Within Strategic Employment Areas, and until such time as a Master Plan is approved, Class B development or other 'sui generis' uses will be supported which: f. Development proposals must be designed to protect and enhance enable and support the habitat priority

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												enhancing green skills for a low-carbon economy, developing digital skills, expanding apprenticeships, improving careers guidance, and simplifying the landscape for training providers and employers. The plan emphasises stronger partnerships between employers, training providers, and local authorities to meet the evolving needs of the local economy.							measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).
02820029	Organisation	Kevin	Fraser	Essex County Council	Yes	E3	Not Stated		No	Effective	ECC requires all strategic scale planning applications of 50 or more homes or employment space providing 2,500sqm (GIA) or more floorspace, to enter into an Employment and Skills Plan to provide employment and skills opportunities to benefit the local community as referenced in paragraph 14.41. ECC requires this to be incorporated into Criteria 1 to afford it the necessary weight in determining planning applications. Reference should be made to	ECC require Criteria 1 is amended to read: Require major developments to be supported by Employment education and Sskills Pplans that demonstrate how local training and employment	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various	B	Need to specify that major applications need to provide employment and skills plans with their applications Add reference to the Essex and Thurrock Skills Improvement Plan (2023)	Accepted additional text requiring employment and skills plans with major applications Accepted and reference added.	1. Require major developments to be supported by Employment education and Sskills Pplans that demonstrate how

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											the Essex and Thurrock Local Skills Improvement Plan (2023) which identifies key skills gaps and identifies key priorities to be delivered through partnerships between employers, training providers, and local authorities to meet the evolving needs of the local economy.	opportunities will be delivered by the development during the construction phase. ECC require the following addition to the Reasoned Justification to read: The Essex and Thurrock Local Skills Improvement Plan (2023) identifies key skills gaps and aims to create a more flexible, responsive education and training system. Key priorities include boosting soft skills, enhancing green skills for a low-carbon economy, developing digital skills, expanding apprenticeships, improving careers guidance, and simplifying the landscape for training providers and			pieces of evidence				local training and employment opportunities will be delivered by the development during the construction phase. These will be secured as part of the S106 agreement. The Essex and Thurrock Local Skills Improvement Plan (2023) identifies key skills gaps and aims to create a more flexible, responsive education and training system. Key

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												employers. The plan emphasises stronger partnerships between employers, training providers, and local authorities to meet the evolving needs of the local economy.								priorities include boosting soft skills, enhancing green skills for a low-carbon economy, developing digital skills, expanding apprenticeships, improving careers guidance, and simplifying the landscape for training providers and employers. The plan emphasises stronger partnerships between employers, training providers, and local authorities to meet the evolving

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																			needs of the local economy.
02820030	Organisation	Kevin	Fraser	Essex County Council	Yes	TC5	Not Stated		No	Effective	<p>ECC welcome references to the role of unhealthy food advertising within Policy TC5. To provide additional detail to statements around local obesity ECC seek reference is made to the National Child Measurement Programme (NMCP) in paragraph 15.32. 3. Effective Paragraph 15.37 makes reference to the proliferation of hot food takeaway provision in Castle Point contributing towards poor health amongst the resident population. Policies restricting children's access to takeaway shops can, amongst other measures, act to discourage unhealthy eating and seek to stop the rising levels of obesity in the Borough. Reference should be made to the Castle Point and Rochford Health and Wellbeing Strategy (2022 – 2027) in paragraph 15.37.</p> <p>ECC welcome references to the Essex Healthy Weight Strategy. It is important to recognise that this approach is a part of a bigger system activity and that we recognise that our efforts in other areas can be undermined if we are not able to suitably address the food environment.</p> <p>ECC welcome references to the role of unhealthy food advertising within Policy TC5 and how the food environment</p>	<p>ECC require paragraph 15.31 is amended to read:</p> <p>The national Obesity Strategy highlights that eating out can contribute towards obesity through the consumption of out of home food high fat, salt and sugar (HFSS). Takeaways and promotions in food stores and high street environment can also add to the number of calories consumed. ECC require paragraph 15.32 is amended to read:</p> <p>This is significant in Castle Point where obesity levels are</p>	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Supports this policy and the references to the role that unhealthy food advertising has on health and how eating out contributes to obesity as evidenced in the National Obesity Strategy.	Accepted and additional text added referencing National Obesity Strategy's evidencein our town centres and local communities. The national Obesity Strategy highlights that eating out can contribute towards obesity through the consumption of calories out of home food which is high in fat, salt and sugar (HFSS). Takeaways and promotions in food stores and high street environment can also add to the

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											impacts children and young people	<p>higher than the national average, with insight from the annual National Child Measurement Programme (NCMP) which monitors the Body Mass Index (BMI) of children in reception and year six. ECC require reference is made to the Castle Point and Rochford Health and Wellbeing Strategy in paragraph 15.37. ECC require paragraph 15.36 is amended to read:</p> <p>As a part of a wider package of local and system activity, the Essex Healthy Weight Strategy (2024 – 2034). ECC require paragraph 15.38 is amended to read:</p> <p>Food choices,</p>								number of calories consumed. This is significant in Castle Point where obesity levels are higher than the national average, with insight from the annual National Child Measurement Programme (NCMP) which monitors the Body Mass Index (BMI) of children in reception and year six. It is therefore necessary to ensure.... As a part of a wider package of local

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												preferences and habits are formed at an early age and children are known to be increasingly more vulnerable to obesity that adults. Whilst there is a range of reasons – poor diet quality and diversity at home, lack of exercise or sedentary lifestyles – the access to fast food takeaways is of concern.								and system activity, †The Essex Healthy Weight Strategy (2024 – 2034), prioritises addressing factors that influence the food environment,... Therefore, the proliferation of hot food takeaway provision in Castle Point is not only affecting the diversity of retail offer in Castle Point, but also contributing towards poor health amongst the resident population

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																			<p>n. With reference to the Castle Point and Rochford Health and Wellbeing Strategy (2025-2028) There is therefore a clear basis for seeking...</p> <p>The NPPF supports the restriction of hot food takeaways and fast food outlets around schools. Food choices, preferences and habits are formed at an early age and Children are known to be increasingly more vulnerable to</p>

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																			obesity that adults. Whilst there is a range of reasons – poor diet quality and diversity at home, lack of exercise or sedentary lifestyles – the access to fast food takeaways is of concern. Restricting access close to schools will assist to discourage children from unhealthy eating and assist in controlling obesity.

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0282-0031	Organisation	Kevin	Fraser	Essex County Council	Yes	TC5	Not Stated		Yes		<p>ECC supports the approach to manage hot food takeaways and fast-food outlets in the borough, in accordance with Paragraph 97 of the NPPF (December 2024). This paragraph recognises the role of planning in shaping the local food environment and explicitly states that:</p> <p>"Local planning authorities should refuse applications for hot food takeaways and fast-food outlets within walking distance of schools and other places where children and young people congregate, unless the location is within a designated town centre; or in locations where there is evidence that a concentration of such uses is having an adverse impact on local health, pollution or anti-social behaviour"</p> <p>Evidence shows that:</p> <ul style="list-style-type: none"> • Hot food takeaways tend to serve food higher in calories than meals prepared at home. • Their numbers are increasing, particularly in areas of deprivation. • These outlets are often concentrated in communities with higher levels of obesity. • There is growing public concern of the intense promotion of unhealthy food in some places and, especially its impact on children and young people <p>ECC acknowledges that Use Class E(b) is intended to capture premises that operate as restaurants, where food is</p>		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Reference should be made to the National Child Measurement Programme (NCMP) to provide additional detail around local obesity Supports this policy and the management of hot food takeaways and fast-food outlets in the borough to include restaurants which offer takeaway services. Reference the Castle Point and Rochford Health and Wellbeing Strategy (2022-2027) which makes reference to hot food takeaways and poor health ECC welcomes reference to the Essex Healthy Weight Strategy within policy TC5 ECC welcomes the reference to the role that unhealthy food advertising plays within Policy TC5 and request some additional information added.	Accepted and additional text added referencing National Obesity Strategy's evidence Noted and agreed. No modification. Accepted however the document is Rochford and Castlepoint Health and Wellbeing Strategy updated February 2025. Strategy 2025-2028 Accepted and reference added to Essex Health Weight Strategy Accepted and additional text added	

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											<p>consumed on-site. However, in practice, some of these establishments may function more like hot food takeaways due to minimal seating and a business model focused on off-premises consumption. Since September 2020, hot food takeaways have been classified as sui generis, requiring planning permission for change of use.</p> <p>NPPF (2024) empowers councils to capture a broader category of 'fast food outlets', including fast food restaurants that may not fall under the sui generis classification. This provides councils with greater flexibility to influence the location of outlets serving less healthy food and drink. However, the term 'fast food outlets' is not yet defined in planning law or regulation, and the Planning Practice Guidance (PPG) has not been updated to provide clarity on this definition.</p>													

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0282-0032	Organisation	Kevin	Fraser	Essex County Council	Yes	D1	Not Stated		No	Effective	ECC consider objective o and the reasoned justification do not fully reflect the principles of inclusive design as set out in NPPF paragraph 135f, which requires planning policies to ensure developments are inclusive, accessible, and promote health and wellbeing. Policy D1 does not currently reference these inclusive design principles or the needs of people who require Specialist Supported Housing, including extra care housing, supported living, wheelchair-accessible homes, and other forms of accommodation for people with physical, sensory, cognitive, and mental health needs. The suggested amendment will enable the creation of inclusive communities, recognising that people with care and support needs may live in general housing and participate in wider community life. ECC seek an additional criteria requiring development to incorporate multifunctional green and blue infrastructure into the design process from the outset rather than it being an optional requirement. This is consistent with the NPPF, which incorporates green design principles by promoting sustainability (paragraph 16a), efficient use of land (paragraph 129), and biodiversity (paragraph 187a), mitigation and adaptation of climate change (paragraph 20d), the inclusion of trees in new developments (paragraph 136), and improved design quality	ECC require an additional Criteria to read: Incorporate multifunctional Green and Blue Infrastructure (GBI) into the design to enhance biodiversity, support climate resilience, and improve the quality and connectivity of open spaces ECC recommend amendments to paragraph 16.28 to: • refer to dementia-inclusive communities, in line with current terminology and best practice; • refer to enabling people to age well and in place as a core principle of inclusive design. • reflect the needs of people with a range of	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	To make reference to design principles for Specialist Supported Housing within Policy D1 in order to create inclusive communities and that people with care and support may live in general housing and participate in wider community life.	Accepted reference to design principles for Specialist Supported Housing added.	

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											<p>(paragraph 137). This is further supported by recommendations and advice provided in the Essex Green Infrastructure Strategy Objectives to create high quality multifunctional GI and improve connectivity between people and wildlife. The ELNRS promotes the use of nature-based solutions, such as green roofs, urban greening, green corridors, and sustainable urban drainage systems in new development projects, to enhance biodiversity, mitigate climate change impacts and improve quality of life for residents. The Green Infrastructure Planning and Design Guide, published by Natural England, provides practical, evidence-based guidance on integrating nature-rich, climate-resilient green infrastructure into new developments and public spaces. It supports planners and designers in delivering high-quality, multifunctional landscapes that benefit both people and nature. https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Design Guide - Green Infrastructure Framework.pdf 3. Effective ECC welcomes the emphasis on accessible and inclusive design in paragraph 16.28, which is consistent with ECC's strategic priorities and the ECC Extra Care Design Guide (2023). However, some refinements are suggested to align with ECC's strategic priorities and align with NPPF, paragraph 135f</p>	<p>support needs, including those with cognitive, sensory, mental health, and physical disabilities.</p> <ul style="list-style-type: none"> • ensure inclusive design expectations include: <ul style="list-style-type: none"> • Dementia-inclusive features; • Wayfinding and sensory elements; • Adaptable layouts; • Accessible outdoor spaces; • Consideration of the needs of different cultures, genders, and disabilities <p>ECC recommend `or` replaces `and` in Criteria 2a and b</p>								

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											which requires planning policies to promote inclusive, accessible development that support health and wellbeing.								
02820033	Organisation	Kevin	Fraser	Essex County Council	Yes	D1	Not Stated		Yes		ECC welcomes the references to sheltered and care accommodation in paragraph 16.21, which is consistent with ECC's strategic priorities and the ECC Extra Care Design Guide (2023). ECC support Criteria h which requires new development to provide and enhance existing and safe convenient pedestrian and cycle routes. Developers should have regard to the Castle Point and Essex Wide LCWIP to seek the provision of any or contribute to and part of an identified route.		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Multifunctional green and blue infrastructure should be designed into the development at the outset to ensure that principles of biodiversity improvements, climate change adaptation and wellbeing are successfully achieved. Welcomes references to sheltered and care accommodation within Policy D1 Provide further reference to inclusive and accessible development Supports the provision of more and enhanced pedestrian and cycle routes. Developers should have regard to the Castle Point Local Cycling and Walking Infrastructure Plan	Accepted Additional text added to incorporate multifunctional green and blue infrastructure into scheme designs Noted CPBC agrees that development should endeavour be accessible to all abilities, but the justification text refers to the necessity of development to be permeable and accessible to allow public walking and cycling routes	Incorporate multifunctional Green and Blue Infrastructure (GBI) into the design to enhance biodiversity, support climate resilience, and improve the quality and connectivity of open spaces Develop

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																	(LCWIP) and the Essex Wide LCWIP	throughout. To add highly specific specialist accessibility design criteria would lose the active travel elements Noted	proposals should have regard to the ECC Extra Care Design Guide principles to ensure opportunities for accessible and inclusive design are taken into account, enabling people to age well in place and reflecting the needs of different cultures, genders and disabilities
02820034	Organisation	Kevin	Fraser	Essex County Council	Yes	D2	Not Stated		No	Effective	ECC agrees that a distance of 400m from a bus stop is a key benchmark representing a reasonable walking distance for people of all abilities to access public transport services. This standard is often used in policy and design guides to ensure that new developments and existing communities are well-served by bus networks, promoting active travel and	ECC require paragraph 16.34 is amended to specify what is regarded as a frequent service to warrant the premium sustainability measure.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices cont	B	Additional clarification around meeting the sustainability criteria of access to services this should be either 400m walking distance to a bus stop or 800 m of a town centre Agrees that walking distance of 400m to a bus stop is a key benchmark for	Accepted clarification made CPBC agree that for the sustainable criteria to be reached a sufficient provision of bus stop times during peak	2. Premium sustainability areas are defined as: a. Sites within 800m of a town centre or

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											<p>sustainable transport use.</p> <p>ECC consider that a bus stop per se is not a good indicator of "premium sustainability" as they may be served by no buses or by irregular and/or infrequent bus services.</p>	<p>A frequent bus service is generally regarded as 4 buses or more serving the stop during the morning and evening peak (excluding school buses) and a good range of services at other times.</p>			aining various pieces of evidence		<p>sustainability but the frequency of the bus service should be defined within the justification text.</p>	<p>hours should be available from the bus stop.</p>	<p>railway station; and or b. Sites within 400m of a bus stop with a regular bus service. These facilities are largely located within town centres. A distance of 400m from a bus stop is a key benchmark representing a reasonable walking distance for people of all abilities to access public transport services. "The service should provide a good level of frequency</p>

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																			in order to make reasonable journeys to work, school and to access community services.
0282-0035	Organisation	Kevin	Frasier	Essex County Council	Yes	D4	Not Stated		Yes		ECC seek a typo is amended to read 'streams' in Criteria 2. ECC support the policy setting out a clear requirement for landscaping and planning condition requirements for management and maintenance plans	ECC require Criteria 2 is amended to read: Pre-existing natural features, including hedgerows, ponds, streams, ditches should be retained and incorporated within the design scheme layout as far as possible.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Typo. Amend to "streams"	Accepted and corrected	2. Pre-existing natural features, including hedgerows, ponds, streams, ditches should be retained and incorporated within the design scheme layout as far as possible.
0282-0036	Organisation	Kevin	Frasier	Essex County Council	Yes	D4	Not Stated		No	Effective	ECC welcome that any tree planting should be required to consider the maintenance issues associated with street tree planting and the need to work with highways officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users consistent with NPPF, paragraph 136.	ECC require the reasoned justification makes reference to the need to consider the Essex Design Guide - Highways Technical Manual - planting in	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing	B	Welcomes that maintenance issues are considered with the planting of trees. Reference should be made to the Essex Design Guide and Highways Technical Manual Planting in Sight Splays. Recommends reference is made to the GBI network in the	Accepted and references added Accepted and references added Noted	3.The most appropriate tree should be planted within the development, compatible with highways standards

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											ECC recommend Criteria 4 makes reference to the Green and Blue Infrastructure (GBI) network, as landscaping plays a key role in delivering and connecting GBI across developments and the wider area. This is consistent with the Green Infrastructure Framework Design Guide and supports delivery of local strategies like the ELNRS and South Essex GBI Strategy.	sight splays.ECC require an additional Criteria in 4 to read: Connectivity to the wider Green and Blue Infrastructure (GBI) network by enhancing ecological connectivity, supporting biodiversity, and integrating nature-based solutions that promote climate resilience.			ng various pieces of evidence		design of landscape schemes Supports policy for setting planning conditions for management and maintenance of landscape schemes		having regard to the Essex Design Guide, Highways Technical Manual - Planting in Sight Splays and the needs of different users 4 e. Connectivity to the wider Green and Blue Infrastructure (GBI) network by enhancing ecological connectivity, supporting biodiversity, and integrating nature-based solutions that promote climate resilience

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0282-0037	Organisation	Kevin	Fraser	Essex County Council	Yes	GB1	No	Not consistent with National Policy	No	Consistent with National Policy	ECC seek Criteria 1 is amended to provide clarity that inappropriate development in the Green Belt will not be supported except in very special circumstances for consistency with NPPF, paragraph 17.14.	ECC require Criteria 1 is amended to read: Within the Green Belt, as defined on the Policies Map, inappropriate development will not be supported except in very special circumstances.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Request amendment to policy to include that development would be accepted in special circumstances within Green Belt	Accepted. Text amended.	1. Development within the Green Belt, as defined on the Policies Map, inappropriate development will not be supported except in very special circumstances in line with the NPPF.
0282-0038	Organisation	Kevin	Fraser	Essex County Council	Yes	GB1	Not Stated		No	Effective	Policy GB1, Criteria 1 states that the Green Belt boundaries are defined on the Policies Map and that development within the Green Belt will not be supported in line with the NPPF. ECC requires that school sites are removed from the Green Belt, where appropriate to enable any future school expansion necessary to meet pupil demand not being required to demonstrate an 'exceptional circumstance' to development in the Green Belt. Any school sites removed from the Green Belt should then be allocated as education land on the Policies Map. This is consistent with Paragraph 43 of the Inspectors Report to the 'withdrawn' Local Plan. Please refer to the response	ECC supports the recommendations of the Inspector into the 'withdrawn' Local Plan and the recommendations of the Green Belt Assessment, Schools in the Green Belt. ECC require paragraph 17.9 is amended to provide commentary with regards the status of	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Request amendment to policy to include that development would be accepted in special circumstances within Green Belt Requires that the following School Sites are removed from Green Belt in order to expand if necessary and allocated as education land. • King John School, Benfleet; • The Deanes School, Benfleet; • Glenwood School, Benfleet; • Kents Hill Infants and Junior School, Benfleet; • Holy Family Catholic	Not accepted. The Castle Point Plan is a new plan and has been prepared in different circumstances to the previous withdrawn plan. The new plan proposes a new housing strategy of urban intensification consequently the Green Belt becomes more significant as the Green Belt tightly bounds the existing urban areas and there is limited	

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											regarding amendments to the Policies Map ECC seek reference is made in Paragraph 17.9 to identify those school sites to be removed from the Green Belt and the realignment of the green belt boundary consistent with the Main Modification 67 to the 'withdrawn' Local Plan and consistent with the Inspector's recommendation. These school sites were: <ul style="list-style-type: none"> • King John School, Benfleet; • The Deanes School, Benfleet; • Glenwood School, Benfleet; • Kents Hill Infants and Junior School, Benfleet; • Holy Family Catholic Primary School, Benfleet; • Robert Drake Primary School, Benfleet; • Canvey Skills Campus / Procat, Canvey Island; and • Cornelius Vermuyden, Canvey Island. 	the school sites which ECC seek are removed from the Green Belt consistent with the Inspectors Report (Paragraph 43) and Main Modification 67 to the 'withdrawn' Local Plan					Primary School, Benfleet; <ul style="list-style-type: none"> • Robert Drake Primary School, Benfleet; • Canvey Skills Campus / Procat, Canvey Island; and • Cornelius Vermuyden, Canvey Island. This would be consistent with the main modification 67 to the withdrawn Local Plan.	green space in Castle Point. As all these sites are within designated Green Belt, the Council considers that further development of these sites is not acceptable.	
02820039	Organisation	Kevin	Fraser	Essex County Council	Yes	GB2	Not Stated		No	Effective	Criteria 1a should also make reference to a site within the 'good' accessibility category of accessibility as there is quite a range between the services provided between a high and moderate accessibility category.	ECC require the following amendment to Criteria 1a to read: The site is in a high, good or moderately accessible location as identified on the map at Appendix D, and has safe footway access, conforming to established	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	More clarity is required over the accessibility category to include "good"	Accepted and additional criteria added	1a. The site is in a high, good or moderately accessible location as identified on the map at Appendix D, and has safe footway access, conforming to establish

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												highway regulations;			ence				ed highway regulations;
02820040	Organisation	Kevin	Frasier	Essex County Council	Yes	ENV 2	Not Stated		Yes		ECC welcomes reference in criteria 1 to working with ECC, as the Lead Local Flood Authority, and other partners to prepare a Riverside Strategy. ECC welcome reference in criteria 1a to TE2100 Plan which allows for future seawall defence maintenance and construction.		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Welcomes criteria to work with ECC as Lead Flood Authority and partners to prepare a Riverside Strategy Welcomes reference to the TE2100 Plan within the policy which allows for future seawall defences.	Accepted, no modifications Accepted, no modifications	5. Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).

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02820041	Organisation	Kevin	Fraser	Essex County Council	Yes	Infra1	Not Stated		No	Effective	<p>ECC seek criteria 3 d is amended to refer to access to adequate cycling and walking links as well as public transport provision. ECC seek amendments to Criteria 5 to provide clarification that education (a nursery) is not defined as being community use and thereby subject to Policy Infra1. Educational establishments and libraries should be protected for their existing use and any change of use only permitted if it has been identified by ECC or other educational providers as being surplus to educational requirements consistent with Policy Infra2.</p> <p>ECC seek amendment to paragraph 19.7 to provide clarification that education is not defined as being community use and thereby subject to Policy Infra1. Educational establishments and libraries should be protected for their existing use and any change of use only permitted if it has been identified by ECC or other educational providers as being surplus to educational requirements consistent with Policy Infra2.</p> <p>ECC seek amendment to paragraph 19.13 to provide clarification that education is not defined as being community use and thereby subject to Policy Infra1. Educational establishments and libraries should be protected for their existing use and any change of use only permitted if it has been identified by ECC or other educational providers as being</p>	<p>ECC require Criteria 3 d is amended to read:</p> <p>Be located in a sustainable location, with access to adequate public transport provision, cycling and walking links; ECC require Criteria 5 is amended to read:</p> <p>In relation to the loss of a locally valued community facility that is commercial in nature, such as a public houses or , private healthcare facility , evidence will need to be submitted to demonstrate that the use is not economically viable and that it is no longer required to meet the needs of the local community. ECC require paragraph 19.7</p>	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	<p>ECC seek criteria 3 “d” is amended to refer to access to adequate cycling and walking links as well as public transport provision. Recommends that nursery provision is not defined as being community use and thereby subject to Policy Infra1. Education should not be defined as community use and thereby subject to Policy Infra1. Educational establishments and libraries should be protected for their existing use and change of use only permitted if ECC and other educational providers identify as being surplus to educational requirements. Considers that education facilities and libraries are removed from the definition of community use in INFRA1 The delivery of Infrastructure to support Specialist and Supported Housing will need to be considered</p>	<p>Accepted and amendment made. CPBC agree early years provision should not be lost to development unless there are other providers within the area to pick up the surplus. Please refer to the SOCG to clarify that libraries should be included within `community` use rather than education, as stated in the Reg 19 response.. CPBC considers that all the services listed within this policy are important including educational services. Additional text has been provided to accommodate EEC requests. Please refer to the SOCG to clarify that libraries should be included within `community` use rather than education, as</p>	<p>3d. Be located in a sustainable location, with access to adequate and within walking distance of public transport provision, cycling and walking links; 5. In relation to the loss of a locally valued community facility that is commercial in nature, such as a public houses; private healthcar e facility or a nursery; evidence will need to be submitted to demonstr</p>

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											<p>surplus to educational requirements consistent with Policy Infra2. 3. Effective ECC welcome reference in Criteria 3c and paragraph 19.10 regarding the need for accessibility of community facilities to be designed to enable accessibility for all regardless of disability, including those with care and support needs who may live in general housing and participate in wider community life. However, paragraph 19.10 does not set out how infrastructure to support SSH will be delivered, as raised in ECC's Regulation 18 response. These forms of housing require integrated infrastructure to ensure operational viability and support independence, including:</p> <ul style="list-style-type: none"> • Access to health and care services (referenced in the Infrastructure Delivery Plan, Section 11.3(g)). • Community facilities suitable for people with care and support needs (Policy Infra3 – Improving Health and Wellbeing) • Transport and mobility infrastructure (NPPF paragraph 117b) • Digital connectivity for care-enabled technology (ECC Market Position Statement, 2023) 	<p>is amended to delete reference to schools as community uses to read:</p> <p>Many of the community halls and GP surgery buildings within the Borough are ageing and have issues accommodating the services required. ECC require the definition of community uses in paragraph 19.13 is amended to read:</p> <p>For the purposes of this Policy, community facilities can be defined as including children's play and recreation facilities, services for young people, older people and disabled people, as well as health facilities, facilities for emergency</p>							stated in the Reg 19 response CPBC has included reference to Specialist and Support Housing within its Infrastructure Delivery Plan and Policy Hou4. New development which provides Specialist and Supported Housing will have to consider within their design the necessary infrastructure needs to support them and provide evidence of this within their planning applications	ate that the use is not economically viable and that it is no longer required to meet the needs of the local community. This should include demonstrable evidence that the facility had been placed on the open market for a period of at least one year at the standard market rate, without success.

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												<p>services, including police facilities, community halls, criminal justice facilities meeting rooms, places of worship, public toilets, pubs and post offices. ECC recommends paragraph 19.10 is amended to include reference to infrastructure required to support Supported and Specialist Housing (SSH), including:</p> <ul style="list-style-type: none"> • Care-ready community facilities • Accessible transport and mobility infrastructure • Digital connectivity to support care-enabled technology <p>ECC recommends that the Infrastructure Delivery Plan (IDP) includes specific reference to</p>								

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												SSH-related infrastructure needs.							
0282-0042	Organisation	Kevin	Fraser	Essex County Council	Yes	Infra 1	Not Stated		Yes		ECC welcomes the reference to community halls and health centres within community facilities in paragraph 19.13 as they help contribute to healthy and inclusive communities. These facilities should be designed inclusively to ensure they are accessible and usable by all people, regardless of age, need, or disability. This is important not only for those living in Specialist and Supported Housing (SSH) but also for people with support needs living in general housing and participating in wider community life. This aligns with ECC's Extra Care Design Guide (2023) and Supported Living Accommodation Standards.		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Welcomes reference to community halls and health centres are included in community facilities and any development which includes new community facilities should be designed to be accessible by all people regardless of age, need or disability.	Accepted no modification	Community facilities represent a considerable stock of brownfield land supply in the Borough. Many of these schools, community halls and GP surgery community buildings within the Borough

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																			are ageing and have issues accommodating the services required Therefore, community buildings should be designed to allow for disabled access and should be located in order to provide the opportunity for as many people as possible to access the facility by foot and/or by public transport. Planning applications should provide details of how accessi

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02820043	Organisation	Kevin	Fraser	Essex County Council	Yes	Infra 2	Not Stated		No	Effective, justified	<p>ECC seek amendments to ensure that Policy Infra1 - Community Facilities and Policy Infra2 – Education, Skills and Learning relate to the relevant uses, which at present is unclear due to definitions in the Glossary and Reasoned Justification.</p> <p>ECC support criteria 1 which states that the change or use or redevelopment of educational establishments will only be permitted if it has been identified by ECC or other educational providers, they are surplus to educational requirements. However, ECC recommends sites of educational use are identified on the Policies Map to help implement this policy. ECC seek amendments to ensure that Policy Infra1 - Community Facilities and Policy Infra2 – Education, Skills and Learning relate to the relevant uses, which at present is unclear due to definitions in the Glossary and Reasoned Justification.</p> <p>ECC consider paragraph 19.17 defines education uses subject to the deletion of 'youth</p>	<p>ECC require Criteria 1 is amended to read:</p> <p>The change or use or redevelopment of educational establishments identified on the Policies Map will only be permitted if it has been identified by ECC or other educational providers, they are surplus to educational requirements. ECC require paragraph 19.17 is amended to read:</p> <p>'....colleges, libraries, youth facilities, employment and skills measures and other</p>	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Request that educational establishments are not included in INFRA1 which refers to community uses and that educational establishments are identified on the policy map and reference made to this in criteria 1. Proposes the removal of "youth facilities" from the definition for Education facilities A cumulative assessment is required with respect to primary, secondary, early years education and childcare and SEND provision based on the scale and distribution of the Plan prior to submission of the Plan. This would feed into an updated Infrastructure Delivery Plan. Welcomes reference to the preparation of Employment Skills Plans and for growth to improve local skills and	Amendments have been made to the text to distinguish educational uses from community uses between INFRA1 and INFRA2 CPBC agrees to identifying sites of educational use on the policies map. Accepted Youth facilities removed from definition Please refer to the SOCG to clarify that libraries should be included within 'community' use rather than education, as stated in the Reg 19 response. CPBC will work with ECC to undertake a further assessment to identify the	1. The change or use or redevelopment of educational establishments, identified on the Policies Map, will only be permitted if it has been identified by ECC or other educational providers, they are surplus to educational requirements. 4.The Council will seek to improve local

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											<p>facilities', which is included in the Glossary definition of Community Uses. Paragraph 19.20 refers to the Infrastructure Delivery Plan establishing where new educational facilities are required based on the growth identified within the Plan.</p> <p>However, CPBC has not requested or provided the relevant information for ECC to undertake the required cumulative assessment of the growth in the Plan consistent with Section 3.4 of the Essex County Council Local and Neighbourhood Planners' Guide to School Organisation and Place Planning (February 2025). Consequently, the references in paragraph 19.25 regarding early years requirements and paragraphs 19.27 – 30 (primary, secondary and SEND) will need to be subject to a cumulative assessment of the scale and distribution of growth set out in this Plan.</p> <p>Prior to submission of the Plan, the IDP will require a significant update to fully reflect the evidence base referenced in the Plan, as a significant amount has been undertaken since the latest IDP. ECC will need to undertake a cumulative assessment of the growth for education and early years and childcare and assist to identify the necessary highway and transportation interventions necessary.</p> <p>ECC welcomes reference to</p>	<p>community learning spaces'. Please refer to the detailed response with regards the Infrastructure Delivery Plan.</p> <p>ECC require an additional Criteria be added to the policy to read:</p> <p>The Council will seek to improve local skills and access to employment opportunities through Employment and Skills Plans.</p>				<p>access to employment skills and employment through Employment Skills Plans.</p>	<p>necessary primary, secondary, early years education and childcare and SEND provision for the submission Plan and the IDP and Site Policies will be updated according to the results of that assessment. In January 2026, ECC provided addendums to the education assessments previously undertaken in November 2025. Accepted and additional criteria added to emphasise the Council's commitment to improve employment and skills in the borough.</p>	<p>skills and access to employment opportunities through Employment and Skills Plans.</p>	

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											<p>Employment and Skills Plans (ESP) in paragraphs 19.35 and 19.36 but reference should be made within the policy to provide them with more weight through the planning application process.</p> <p>ECC, via the ECC Developers Guide to Infrastructure Contributions (2025), requires all strategic scale planning applications of 50 or more homes or employment space providing 2,500sqm (GIA) or more floorspace, to enter into an Employment and Skills Plan to provide employment and skills opportunities to benefit the local community. An ESP must:</p> <ul style="list-style-type: none"> • include apprenticeships, work experience, volunteering, careers information and training; • must be shared with and agreed by the LPA and ECC ahead of the S106 agreement being signed off; • include options such as the direct delivery or skills and employability programmes, school / college engagement and work experience opportunities, or construction or workplace apprenticeship schemes for local residents; • be secured through S106 agreements; and • cover the Council's costs associated with the monitoring of the plans, with reports provided to the Council by developers for inclusion in the Authority Monitoring Report. 												

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02820044	Organisation	Kevin	Fraser	Essex County Council	Yes	Infra 2	Not Stated		Yes		<p>ECC support reference in Criteria 2 where a development proposal, either individually or cumulatively, increases demand for education facilities beyond those available within the local area, development will be required to provide land for a new educational facility, expand or alter an existing facility and/or make a proportionate contribution to fund necessary improvements to education facilities.</p> <p>Reference to development providing land for a new educational facility, expand or alter an existing facility and/or make a proportionate contribution to fund necessary improvements to education facilities should also be referenced in Policy SP4 – see earlier response.</p>		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Development proposals which increase demand for education facilities beyond those available within the local area should contribute to expansion or alteration of the facility to provide for the additional demand	Accepted no modifications Policy SP4, Criteria 2 has been amended to make reference to where necessary, developers being required to make direct provision or provide proportionate contributions towards the provision of infrastructure required to make a development acceptable in planning terms providing consistency with this policy	For the purpose of this policy, education facilities include, but are not limited to early years and childcare (full day care, pre-schools, child minders, school run early years provision, and ‘wrap around care’ – breakfast, after school and holiday clubs), schools (primary, secondary and Post 16 Education), Special Education Needs and Disabilities (SEND), colleges, libraries;

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																			youth facilities, employment and skills measures and other community learning spaces
02820045	Organisation	Kevin	Fraser	Essex County Council	Yes	Infra 3	Not Stated		No	Effective	ECC welcome and support Policy Infra3 which aims to support to improve the health and wellbeing of residents through partnership working with Health Stakeholders and Public Health. ECC recommend paragraph 19.44 is amended to reference the local Castle Point and Rochford Health and Wellbeing Strategy	ECC require paragraph 19.44 is amended to read: More broadly, the Council will work with the NHS, Public Health and other partners through the South East Essex Alliance and the Castle Point and Rochford Health and Wellbeing Board to address issues and priorities emerging through the Joint Strategic Needs Assessment (JSNA), the Essex Joint Health and Wellbeing Strategy and the Castle Point and	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Welcomes reference to the preparation of Employment Skills Plans and for growth to improve local skills and access to employment skills and employment through Employment Skills Plans. Typo	Accepted and additional criteria added to emphasise the Council's commitment to improve employment and skills in the borough. Accepted	More broadly, the Council will work with the NHS, Public Health and other partners through the South East Essex Alliance and the Castle Point and Rochford Health and Wellbeing Board to address issues and priorities emerging through the Joint Strategic Needs Assessment

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												Rochford Health and Wellbeing Strategy.							(JSNA), and the Essex Joint Health and Wellbeing Strategy and the Castle Point and Rochford Health and Wellbeing Strategy. This will not only involve
0282-0046	Organisation	Kevin	Fraser	Essex County Council	Yes	Infra 3	Not Stated		Yes			ECC require the following typo in paragraph 19.50 is amended to read: The Essex Healthy Places document is an advice note on how planners, developers...	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Typo	Accepted.	The Essex Healthy Places Document is an advice note on how planners, developers and designers can incorporate health into proposals and the key attributes in creating healthy places.

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02820047	Organisation	Kevin	Fraser	Essex County Council	Yes	Infra 4	Not Stated		No	Consistent with National Policy	School playing fields are not considered public open space in the same way as parks or village greens. While some schools may allow community access to their playing fields, they are primarily intended for the physical education and recreation of the students who attend the school. Government guidance on school land says that school playing fields are provided for the benefit of pupils and their enjoyment, and any community use is usually at the school's discretion. There is a strong policy presumption against the disposal or change of use of school playing field land, and the Secretary of State's prior consent is needed for any such action. ECC require school playing fields being counted as 'open space' be deleted from the schedule in Appendix J and the Policies Map.	ECC require reference to school playing fields in Appendix J and on the Policies Map are deleted so they are not covered by Criteria 1.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	School playing fields should not be considered public open space and their change of use is restricted.	Accepted. The Council agrees that school playing fields are not public open spaces.	Delete reference to school playing fields in Appendix J and on the Policies Map for open spaces
02820048	Organisation	Kevin	Fraser	Essex County Council	Yes	Infra 6	Not Stated		Yes		ECC welcome reference to the Essex Design Guide and in particular the EOPA Planning Guidance for Digital Connectivity (focused on fixed line Broadband connections) to guide the pre-application and planning application process for mobile (4G/5G). The proposed growth is likely to have a considerable impact on existing or planned cellular network capacity. It will be essential for early collaboration between developers, local planning authorities and mobile network operators (or their infrastructure partners) to		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Collaboration between developers, local authorities and mobile network operators will be essential to minimise the impact on the cellular network capacity from proposed growth. Welcomes reference to the Essex Design Guide and the EOPA Planning Guidance for Digital Connectivity	CPBC agrees that it will be important to collaborate early with digital stakeholders and developers to address communities' digital needs with minimum impact from digital structures. Noted no modifications.	

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											identify suitable locations for new or upgraded masts that minimise impact on the local community and environment while effectively addressing connectivity needs.				ence				
02820049	Organisation	Kevin	Frasier	Essex County Council	Yes	Infra 6	Not Stated		No	Consistent with National Policy	To be consistent with NPPF, paragraph 120 reference should be made to the potential for mast sharing wherever possible to minimise impacts, along with their sympathetic design and camouflage with the local area. ECC welcome reference to the Essex Design Guide and in particular the EPOA Planning Guidance for Digital Connectivity (focused on fixed line Broadband connections) to guide the pre-application and planning application process for mobile (4G/5G).	ECC require paragraph 19.70 is amended to read: However, initial roll out of 5G provision has highlighted some design, layout and siting concerns that need to be addressed in future provision. Use of existing masts, buildings and other structures should be encouraged. Where new sites are required (such as for new 5G networks) equipment should be sympathetically designed and camouflaged where appropriate	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Recommends digital mast sharing and sympathetic designs to minimise impacts of digital infrastructure. Typo to be corrected	Accepted. CPBC agree that mast sharing and good design can minimise the impact of masts on the local area.	However, initial roll out of 5G provision has highlighted some design, layout and siting concerns that need to be addressed in future provision. Use of existing masts, buildings and other structures should be encouraged. Where new sites are required (such as for new 5G networks) equipment should be sympathetically designed

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																			and camouflaged where appropriate. The Essex Design Guide includes a section on 'Planning for 5G'....
0282-0050	Organisation	Kevin	Frasier	Essex County Council	Yes	Paragraph 20.4, Page 156	Not Stated		No	Not Stated	ECC require the following typo in paragraph 20.4 is amended to read: The Net Zero: Making Essex Carbon Neutral report details an Avoid, Shift and Improve approach for reducing transport emissions:		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Typo to be corrected	Accepted	...The Net Zero: Making Essex Carbon Neutral report details an Avoid, Shift and Improve approach for reducing transport emissions:
0282-0051	Organisation	Kevin	Frasier	Essex County Council	Yes	Paragraph 20.6, 1st sentence, Page 156	Not Stated		No	Effective	Reference could be made to some of the projects in the South Essex Implementation Plan, Appendix A – Scheme List, which have emerged from a prioritisation exercise representing ideas from a snapshot in time but which are not guaranteed to be funded as part of LTP4. As funding and circumstances change so will	ECC require reference to the potential date of adoption of the LTP4 in the 1st sentence is amended to read:	Yes	Not Stated	Yes, ECC supplied 8 additional appendices	B	Reference should be made to projects within the South Essex Implementation Plan Appendix A and some of the proposed schemes	Accepted. CPBC supports schemes and initiatives that improve the highway network in South Essex particular key routes such as A13 and the A127/A130	ECC are currently in the process of updating the LTP, with a new LTP4 scheduled for

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											priorities for such schemes. For example, the A13 sustainable corridor; A127/A130 Fairglen amongst others.	Winter 2025/2026			containing various pieces of evidence			Fairglen junction.	adoption in 2025 winter 2026.
02820052	Organisation	Kevin	Fraser	Essex County Council	Yes	T1	Not Stated		No	Positively prepared, justified	ECC welcome reference in paragraph 1 to CPBC working with the local Highways and Transportation Authorities and service providers to secure transport network improvements in the borough to reduce carbon emissions and be net zero by 2050. Reference to mobility hubs at Benfleet Station, Kiln Road, employment areas and town centres in Criteria 5 are welcomed in principle. Please refer to comments to Policy T5 - Highway Impact, Paragraph 20.52, Page 166 regarding the Transport Assessment and IDP. Prior to submission, the IDP will need to be updated to reflect the significant new policy guidance and evidence base, including the Transport Assessment, that has been undertaken since it was prepared early in 2025. Please refer to the response to the IDP.		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Supports CPBC working with transport stakeholders to secure network improvements and reduce carbon emissions	CPBC will continue to work with Highways and Transportation Authorities and stakeholder to secure transport improvements and will provide ECC following the feedback from public consultation with an updated Transport Assessment prior to submission.	

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02820053	Organisation	Kevin	Fraser	Essex County Council	Yes	T1	Not Stated		No	Not Stated	<p>NPPF, paragraph 109 requires a vision led approach to identifying transport solutions. ECC welcome reference to an 'avoid, shift and improve' approach in paragraph 20.4.</p> <p>The Plan policies and area specific policies make reference to general improvements, but the Plan and Proposals Map currently lack a spatial 'big picture' vision of how sustainable transport can be improved or key corridors and junctions that should be improved (subject to funding being identified)</p> <p>Please refer to comments to Policy T5, paragraph 20.52.</p>	<p>Prior to submission the site policies and Proposals Map should identify key necessary interventions based on the local impact on routes, junctions and identify necessary interventions.</p>	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Considers that there is lack of spatial vision of how sustainable transport can be improved	<p>The Transport Strategy which supports the Castle Point Plan is based on the principles of avoid, shift and improve. This is supported by aligning its active policies to LWCIP and through its proposed feasibility work on improved access in and around Canvey Island in policy C5 and its continued support for improvements on the key junctions and highway links across South Essex</p> <p>EEC is reviewing the updated Transport Assessment, following the comments submitted as part of the Regulation 19 consultation. If the updated TA is supported by ECC its recommendations will need to be incorporated into the relevant plan policies and</p>	

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																		any updates to the IDP, where necessary. Bus service provision is outside of the remit of the Council but the Council aims to support improvements in coverage, frequency and quality of bus services through engagement with bus service providers during the master planning process of key development sites. EEC is reviewing the updated Transport Assessment, following the comments submitted as part of the Regulation 19 consultation. If the updated TA is supported by ECC its recommendations will need to be incorporated into the relevant plan policies and any updates to the IDP, where necessary	

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02820054	Organisation	Kevin	Fraser	Essex County Council	Yes	Paragraph 20:16, Page 159	Not Stated		No	Justified, Effective	Paragraph 20.16 refers to the need to improve the coverage, frequency, reliability and quality of bus services if a modal shift is to be achieved. There is no clarity on what level of modal shift is desired or how this may be achieved via specific schemes in the Schedule of Interventions (see comments to Policy T5 Highways Impact) and how it will impact highway capacity. This is important to demonstrate consistency with NPPF, paragraph 109 where LPAs are required to undertake a vision led approach to identifying transport solutions.	Please refer to the response to Policy T5 and the Transport Assessment.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Requires further clarity on specific schemes required to improve public transport services to support proposed growth	The proposed wording requires developers to provide active travel routes with high accessible specifications, which might not be possible due to site specifications on some travel route developments. CPBC proposes the following wording: New development must be designed to be inclusive, and to prioritise and maximise opportunities for safe and convenient active travel routes supporting health and active lifestyles. Design guidance on inclusive active travel routes can be found on Active travel design resources Active Travel England This requirement should also be reflected in	

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																		development proposals and master plans. The CPBC agrees that developer contributions for active travel should be appropriate and proportionate to the development taking account of the Infrastructure Delivery Plan. CPBC have updated the Plan's Transport Assessment following public consultation and will provide this for Essex Highways to review.	
02820055	Organisation	Kevin	Frasier	Essex County Council	Yes	Paragraph 20:28, Page 161	Not Stated		Yes		Work is programmed to commence the permitted short-term A127 / A130 Fairglen Interchange (short term) improvements in 2025 and will cover a two-year construction period.	ECC require paragraph 20.28, final sentence is amended to read: Work on improvements to the Fairglen Interchange (short term) is expected to commence in 2025.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Comments that work on short term improvements to Fairglen Interchange are scheduled in 2025	Noted and text updated Work on initial improvements to the Fairglen Interchange (short term) is expected to commence in due course 2025.

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02820056	Organisation	Kevin	Frasier	Essex County Council	Yes	T3	Not Stated		No	Justified, Effective	<p>Criteria 1 requires new development to be designed to prioritise and maximise opportunities for safe and convenient active travel routes supporting healthy and active lifestyles. This must include accessibility to and accessing SSH schemes.</p> <p>ECC welcome the recognition in paragraph 20.33 of mobility needs for older and disabled residents, including the use of mobility scooters and wheelchairs. This aligns with ECC's Market Position Statement and the Extra Care Design Guide, which emphasise the importance of accessible transport in enabling independence and reducing isolation. Necessary measures may include but will be determined on a case-by-case basis:</p> <ul style="list-style-type: none"> • Drop-off zones for care providers and residents with limited mobility – required under Building Regulations Part M4(3) and ECC Supported Living Accommodation Standards (2023) • Accessible pedestrian infrastructure (e.g. dropped kerbs, level surfaces) – consistent with NPPF paragraph 117 a and c requiring developments to be accessible by sustainable transport • Public transport connectivity to health and community 	<p>ECC require reference is provided in paragraph 20.33 to transport infrastructure required to support SSH, including drop-off zones for care providers and residents with limited mobility; accessible pedestrian routes (e.g. dropped kerbs, level surfaces); parking standards are aligned with M4(3) accessibility requirements and public transport connectivity to health and community services.</p> <p>ECC require Criteria 3 is amended to read:</p> <p>Developments will be required to make</p>	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	<p>Requests the addition of the SSHANA for the design of active travel improvements. Supports the provision of developer contributions for providing active transport routes but requires that these are linked to the needs of the development and not just those that have been identified within the Infrastructure Delivery Plan, which is likely to change over time.</p> <p>Essex Highways require to review the final Transport Assessment including the Canvey Addendum with clarification over the proposed schedule of interventions and schemes to support growth and how they have been selected.</p>	<p>The proposed wording requires developers to provide active travel routes with high accessible specifications, which might not be possible due to site specifications on some travel route developments. The CPBC agrees that developer contributions for active travel should be appropriate and proportionate to the development taking account of the Infrastructure Delivery Plan. CPBC have updated the Plan's Transport Assessment following public consultation and will provide this for Essex Highways to review. EEC is reviewing the updated Transport</p>	<p>3. Developments will be required to make appropriate and proportionate financial contributions towards active travel improvements within the Borough taking into account requirements of the Infrastructure Delivery Plan. ...As Castle Point has a population that is older than average, this wider definition</p>

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											<p>services – referenced in the ECC Planning with Care Guidance (2025) and Essex Local Transport Plan (LTP4)</p> <ul style="list-style-type: none"> • Parking standards aligned with M4(3) requirements – consistent with the Essex Parking Guidance (2024) and ECC’s Developers’ Guide to Infrastructure Contributions (2025), Appendix J. <p>These measures align with NPPF, 115b, which requires planning policies to provide safe and suitable access to the site for all users and to essential services and sustainable transport and 135f to create places that are safe, inclusive and accessible and which promote health and well-being and</p> <p>ECC supports the principles of the Policy, namely, prioritising and maximising safe and convenient and multifunctional active travel routes; making appropriate and proportionate financial contributions towards active travel improvements; and securing highways works via S278 agreements and/or financial contributions (S106). However, Criteria 3 only refers to developments being required to make appropriate and proportionate financial contributions towards active travel improvements taking into account requirements of the Infrastructure Delivery Plan. ECC has recommended the deletion of Criteria 1 in Policy SP4, as it implies that contributions will only be made if the site is linked to an infrastructure item listed</p>	<p>appropriate and proportionate financial contributions towards active travel improvements within the Borough.</p> <p>ECC require further clarification with regards how the ‘Schedule of Interventions’ have informed the Plan and can be incorporated into the next iteration of the IDP to support the Submission Plan and its policies.</p>					Assessment, following the comments submitted as part of the Regulation 19 consultation. If the updated TA is supported by ECC its recommendations will need to be incorporated into the relevant plan policies and any updates to the IDP, where necessary	it is important in ensuring that active travel infrastructure supports the whole community, including those who are less able, and are at risk of social isolation. Development proposals should have regard to the ECC Extra Care Design Guide principles to ensure opportunities for accessible and inclusive design are taken, enabling people to age well in place and	

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											<p>in the IDP. The IDP is a 'living document' and will change over time as more information is known. The purpose of the policy should be to ensure that all sites (including windfalls) make an appropriate contribution towards the necessary infrastructure consistent with the statutory tests in regulation 122 (as amended by the 2011 and 2019 Regulations), namely necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. Paragraph 20.34 refers to the Transport Assessment identifying an 'Initial Schedule of Interventions' including a series of potential improvements to local walking and cycling networks. This schedule was updated to reflect the outcome of the transport modelling for this Plan. ECC was not provided with an opportunity to comprehensively review the completed TA (including its Appendices) and the West Canvey Addendum (August 2025), with the latter published post commencement of the consultation. Essex Highways has reviewed the TA and the detailed report (including Appendices) is set out as Appendix 5. However, it is not expected that the overall conclusions of the TA and the Addendum will change but further work is necessary to ensure the modelling approach</p>														<p>reflecting the needs of different cultures, genders and disabilities. All Developments that generate significant amounts of movement may will be required to produce a Travel Plan having regard to the thresholds in Essex County Council published guidance. Development should have regard to the Schools Design Guidance (May 2025)</p>

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											<p>is robust for examination and scrutiny by other parties. Some high level concerns regarding the Transport Assessment include the following with regards the 'Schedule of Interventions'</p> <p>Further clarification is necessary as to whether the Schedule of Interventions (a list of potential schemes/projects which could improve the various modes of transport) are general proposals or tailored to specific development sites; specific interventions require further evidence as to why they have been selected, how they will achieve modal shift, will influence highway capacity at the current congestion hotspots (paragraph 20.19) which are likely to worsen as a consequence of growth, should be prioritised, link to the Plan and could form packages of measures to inform the IDP.</p>										<p>which provides guidance on school designs which are well-integrated into the community, with connections to pedestrian, cycle, and public transport networks, encouraging active travel and reducing car dependence. This integration supports the creation of vibrant, inclusive public spaces designed to enhance social interaction and community cohesion.</p>

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02820057	Organisation	Kevin	Fraser	Essex County Council	Yes	T5	No	Does not comply with Duty to Cooperate	No	Justified	2. Justified Paragraph 20.52 refers to the transport modelling undertaken for the Plan indicating that there are several junctions in the borough which are close to or are operating at or over capacity currently, these junctions will worsen if they are not mitigated, and where a junction is operating in excess of its designed capacity any additional exceedance is likely to have a severe impact on the transport network and need to be mitigated for development to go ahead. ECC has held regular meetings with CPBC and its consultants Systra to assess the expected transport impacts associated with the Plan growth. ECC contributed to and was satisfied that the Transport Assessment Scoping Report provided an appropriate piece of evidence to support the Regulation 18 Consultation (Issues and Options – July – September 2024). However, ECC was not provided with an opportunity to comprehensively review the completed TA (including its Appendices); the West Canvey Addendum (August 2025 - published post commencement of the consultation) and the Green Belt Site Assessment (with regards transport matters) in advance of the public consultation. Consequently, ECC instructed Essex Highways to undertake a full review of these documents and its response can be viewed	Essex Highways has reviewed the TA and the detailed report (including Appendices) is set out as Appendix 5. The issues, observations and questions have been classified into minor, moderate and severe categories. These will need to be reviewed and addressed as part of an update to the TA prior to submission of the Plan and any necessary amendments incorporated into the next iteration of the Plan.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	The Plan referred to a number of Highway Junctions operating at capacity. ECC were satisfied with the Transport Assessment Scoping Report but had not had sight of completed Transport Assessment with the West Canvey Addendum and The Green Belt Assessment with regards Transport matters. It is not considered that the conclusions would change but further modelling would be required and any necessary amendments to be incorporated into the plan prior to submission. EEC also consider that the methodology for the multicriteria assessment of Green Belt Sites is not clear or robust, in particular the evidence and weight given to transport criteria for “severe “ impact and “significant” impact on transport networks. EEC queries why some sites which were put forward in the previous withdrawn plan but are no longer considered acceptable for the Castle Point Plan.	CPBC has undertaken additional work to the Transport Assessment which will be sent to ECC to be reviewed prior to submission of the Plan. EEC is reviewing the updated Transport Assessment, following the comments submitted as part of the Regulation 19 consultation. The methodology for multicriteria assessment of Green Belt Sites can be found in the Housing Topic Paper 2025. CPBC considers its assessment of transport issues relating to proposed sites has been consistent and robust. The Castle Point Plan is a new plan which has been drawn up some 6 years	

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											<p>in Appendix 5. It is not expected that the overall conclusions of the TA and the Addendum will change but further work is necessary to ensure the modelling approach is robust for examination and scrutiny by other parties. The key issues which are considered to be significant and likely to have a large impact on the analysis and findings of the TA are set out below:</p> <p>Transport Assessment</p> <ul style="list-style-type: none"> • all junctions considered 'in-scope' of assessment should be modelled with forecast traffic flows to enable identification of where developer-funded mitigation is required, even if the mitigation measures are not yet fully defined in the Plan. • justification is required explaining why junction modelling of the key strategic junctions of Fairglen Interchange, Sadlers Farm and Rayleigh Weir has not been undertaken. • further assessment is required to evidence the potential cross boundary impacts on neighbouring authorities, in particular with regards the A13, A127, A130 and larger B roads. • the Schedule of Interventions (a list of potential schemes/projects which could improve the various modes of transport) require further evidence as to why they have been selected, how they will achieve modal shift, be prioritised, link to the Plan sites and could form packages of 												after the withdrawn plan and consequently supported by new UpToDate evidence.	

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											<p>measures to inform the IDP. Green Belt Site Assessment</p> <ul style="list-style-type: none"> • clarification is required regarding the methodology of the multi-criteria assessment and some of the site conclusions. Further modelling work will be required when considering these sites further. ECC has some concerns regarding the robustness and transparency of the evidence to justify the significant shortfall of 5,500 homes. For example, the Green Belt Sites Assessment concludes that only a limited number of Green Belt sites may be suitable for further consideration, but none are allocated. It is unclear what 'weight' has been given to the assessment of these sites with regards highway matters, namely: <ul style="list-style-type: none"> • how circumstances have substantially changed on several Green Belt sites which were allocated by CPBC in the withdrawn Plan (2022), and following scrutiny at examination found to be suitable for development by the Inspector in his report, with regards their impact on highway capacity, opportunities to enhance active and sustainable travel measures, and issues regarding site access (namely partly via residential routes). • the inconsistent reference to the 'severe' impact of growth on the highway network – the TA refers to 'significant impact' and parts of the Plan refers to 'severe' with regards the general performance of the 											

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											network and at specific locations. It is unclear what 'weight' has been given to the impact on the highway network in determining the deliverability of sites identified in the Green Belt Site Assessment. A number of recent appeals have been allowed despite junctions modelled as being operating at or close to capacity. The impact was not considered severe by Inspectors with respect to NPPF e.g. APP/F2360/W/22/3295498 for housing at Penwortham, Preston. CPBC will need to be satisfied that their approach to severity is defensible at examination.												
02820058	Organisation	Kevin	Frasier	Essex County Council	Yes	Policy T5 - Highway Impact, paragraph 20.55, Page 166	Not Stated		No	Effective	ECC welcome reference in criteria 1 to developers being required to prepare a Transport Assessment or Transport Statement, and a Travel Plan, having regard to the thresholds published by the local Highway and Transportation Authority. However, ECC seek clarification to paragraph 20.55 which implies that all development, irrespective of scale, that generate significant movements will be required to produce a Travel Plan. As set out in the Developers' Guide (September 2025) developments comprising	ECC require paragraph 20.55 is amended to read: developments that generate significant amounts of movement may be required to produce a Travel Plan having regard to the thresholds in Essex County	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of	B	Supports the requirement for all development which are likely to impact the transport networks to provide Transport Assessments/Statements and a Travel Plan	Accepted. CPBC agrees that any development which impacts the transport network should prepare transport assessments and travel plans to assess their impacts.					

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											of 80 or more dwellings are required to prepare a Travel Plan setting out information set out in paragraph 20.55. Smaller developments may require a Travel Plan, if there are concerns around pollution, congestion, and pressures on the existing road network.	Council published guidance.			evidence				
02820059	Organisation	Kevin	Frasier	Essex County Council	Yes	T6	Not Stated		No	Effective	ECC welcome reference in criteria 1 to developers being required to prepare a Transport Assessment or Transport Statement, and a Travel Plan, having regard to the thresholds published by the local Highway and Transportation Authority. However, ECC seek clarification to paragraph 20.55 which implies that all development, irrespective of scale, that generate significant movements will be required to produce a Travel Plan. As set out in the Developers' Guide (September 2025) developments comprising of 80 or more dwellings are required to prepare a Travel Plan setting out information set out in paragraph 20.55. Smaller developments may require a Travel Plan, if there are concerns around pollution, congestion, and pressures on the existing road network.	ECC require paragraph 20.59 is amended to read: Development should have regard to the 'Schools Design Guidance (May 2025) provides guidance on school designs which are well-integrated into the community, with connections to pedestrian, cycle, and public transport networks, encouraging active travel and reducing car dependence. This integration supports the creation of vibrant, inclusive public spaces designed to enhance social	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Requires that development involving schools should have regard to the School Design Guidance (May 2025)	Accepted and text amended	

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												interaction and community cohesion.							
02820060	Organisation	Kevin	Frasier	Essex County Council	Yes	T7	Not Stated		No	Effective	ECC welcomes reference to the Essex Parking Guidance prepared by EPOA in Criteria 1. However, reference to Part 1 and 2 should be removed from the policy, which is clarified within paragraph 20.63. This is to avoid any confusion in policy terms given that Part 2 of the Guidance refers to sites of 1,000 homes or more, of which West Canvey is relevant. ECC seek an amendment to Criteria 3 to insert the requirement to 'have regard to' the Essex Parking Guidance prepared by EPOA.	ECC require Criteria 1 is amended to read: Proposals for development will be required to make provision for all users having regard to the Essex Parking Guidance (Part 1 and 2) prepared by EPOA. ECC require Criteria 3 is amended to read: Proposals for development will be required to have regard to the Electric Vehicle Charging Standards set out in the Essex Parking Guidance.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Welcomes reference to the Essex Parking Guidance. Clarification required in text over the references to Part 1 and Part 2 of the Parking Guidance as Part 2 refers to development over 1000+ dwellings Require that development proposals will have regard to the Essex Parking Guidance	Accepted and text amended Accepted and text amended	1. Proposals for development will be required to make provision for all users having regard to the EPOA Essex Parking Guidance (Part 1 and 2) prepared by EPOA. 3. Proposals for development will be required to have regard to the Electric Vehicle Charging Standards set out in the Essex EPOA Parking

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																			Guidance prepared by EPOA.
02820061	Organisation	Kevin	Fraser	Essex County Council	Yes	Paragraph 20.63, Page 168	Not Stated		No	Effective	ECC seek an amendment to paragraph 20.63 to refer to the Essex Parking Guidance (2024) prepared by EPOA and clarification given to large scale development comprising of 1,000 homes or more.	ECC require paragraph 20.63 is amended to read: The Essex Planning Officers Association's (EPOA) Essex Parking Guidance (2024) were prepared with both the above balancing act in mind, and the need to move towards a net zero transport network. '.....and Part 2 – for Garden Communities and Large-Scale Developments (including a 'Connectivity Tool'), where large is considered 1,000 homes or more.'	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Request correction that it is Essex Parking Guidance and not Essex Parking Standard and clarification that large scale development represents 1,000 homes or more.	Accepted and text amended	The Essex Planning Officers Association's (EPOA) Essex Parking Guidance Standard (2024) were prepared with both the above balancing act in mind, and the need to move towards a net zero transport network. and Part 2 – for Garden Communities and Large-Scale Developments (including a 'Connectivity

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																			Tool'), where large is considered 1,000 homes or more. A study was commissioned to understand parking needs across Essex... The ECC Essex Local Transport Plan Development Management Policies sets out within its highways planning advice specific requirements for developments that are likely to be regularly accessed by HGVs at policy DM19.This standard appears

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																			appropriate for other servicing and delivery vehicles that occasionally access many developments also. Design Guidance on Street Design with respect to waste collection can be found in the Essex Design Guide-Highways Technical Manual.
02820062	Organisation	Kevin	Fraser	Essex County Council	Yes	T8	Not Stated		No	Effective	ECC support Policy T8 and criteria 1 requiring development proposals to be regularly serviced. The regularity of servicing requirements should be set out in the Freight Management Strategy on a case-by-case basis.	ECC seek further clarification be provided into the reasoned justification defining what is meant by 'regular servicing'?	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various	B	Provide clarity on what is meant by regular servicing of HGV vehicles with reference to access to servicing on transport routes.	Regular servicing management would be dependent on the type of freight and industry and would be considered on a case-by-case basis.	

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															pieces of evidence				
0282-00663	Organisation	Kevin	Frasier	Essex County Council	Yes	Paragraph 20.69, Page 169	Not Stated		No	Effective	Further clarification should be provided that the ECC Development Management Policies are located on the ECC website under highways planning advice.	ECC require paragraph 20.69 is amended to read: The ECC Management Policies sets out within its highways planning advice specific requirements for developments that are likely to be regularly accessed by HGVs at policy DM19.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Provide link to ECC Development Management Policies Highways Planning Advice which are located on the ECC website. This provides advice on specific requirements for developments which are likely to be regularly accessed by HGVs.	Accepted and text amended with link to information	
0282-00664	Organisation	Kevin	Frasier	Essex County Council	Yes	Paragraph 20:71, Page 169	Not Stated		No	Effective	Whilst the requirements for waste collection vehicles are acknowledged in paragraph 20.71 and design of streets should be consistent with the Essex Design Guide – Highways Technical Manual which provides the full understanding of the relevant design principles for new residential developments. Refuse-collection vehicles will circulate on all parts of the adopted road system but not on private drives. In the case of mews court cul-de-sac, they will enter in reverse gear and not turn. Refuse collection will be made only from those dwellings within 25m of an adopted road		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Reference should be made to Essex Design Guide- Highways Technical Manual to ensure streets are designed to accommodate waste collection vehicles	Noted and additional text with reference to Design Guide Highways Technical Manual Added	

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											local operatives may have different criteria. In other cases, it is necessary to provide a shared bin-collection point screened by an above-eye-level wall. This should be located within 25m of an adopted road.				ence				
02820065	Organisation	Kevin	Fraser	Essex County Council	Yes	SD1	Not Stated		Yes		The refusal of new bungalows or other self-contained ground floor residential accommodation (without appropriate refuge) in Criteria 1b is welcomed ECC welcome reference in criteria 4 to a 19m wide buffer of land adjacent to the existing flood defences on Canvey Island, as shown on the Policies Map, to safeguarded for future flood defence works, landscaping, environmental enhancements and amenity.		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Welcomes the restriction on new bungalows or ground floor residential accommodation on Canvey Island due to tidal flood risk. Welcomes 19m wide land buffer to existing flood defences on Canvey Island is safeguarded should any future flood defence work required.	Noted Noted	6. Development proposals must ensure that habitats sites are not adversely effected and be in accordance with Policy ENV2 – Coastal & Riverside Strategy.
02820066	Organisation	Kevin	Fraser	Essex County Council	Yes	SD1	Not Stated		No	Effective	ECC seek criteria 6 requires new development to also be in accordance with Policy ENV2 – Coastal & Riverside Strategy to ensure the wider environment and issues are considered regarding any development proposals.	ECC require Criteria 6 is amended to read: Development proposals must ensure that habitats sites are not adversely effected and be in accordance with Policy ENV2 – Coastal & Riverside Strategy	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of	B	Additional text to align policy with ENV 2 to ensure that Habitat sites are not adversely impacted in accordance with ENV2	Accepted and text amended.	

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															evidence				
02820067	Organisation	Kevin	Frasier	Essex County Council	Yes	SD2	Not Stated		No	Effective	To ensure consistency with Policy SD3, criteria 2 reference should be made to a drainage strategy being required where development is located within an area at risk of fluvial or surface water flooding, or is within a Critical Drainage Area. NPPF paragraph 182 states that where surface water flooding is a known issue, which includes Critical Drainage Areas, policies should encourage development to provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity in collaboration with the Lead Local Flood Authority, namely ECC. This approach supports betterment by turning flood risk mitigation into an opportunity for placemaking, green infrastructure and community resilience. This will be influenced by the preparation of a drainage strategy which should comply with the Sustainable Drainage Systems Guide for Essex. NPPF paragraph 182 states that where surface water flooding is a known issue, which includes Critical Drainage Areas, policies should encourage development to provide multifunctional benefits wherever possible, through facilitating improvements in water quality	ECC require Criteria 6 is amended to read: Where a development proposal is for a site in an area at risk of fluvial or surface water flooding, or is within a Critical Drainage Area, a drainage strategy will be required to demonstrate how both on and off-site flood risk will be managed and mitigation measures should be satisfactorily integrated into the design and layout of the development to provide betterment to the community by reducing flood risk. Any natural or semi-natural water features such as ditches, dykes	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Additional text stating that a drainage strategy should be required within areas at risk of fluvial or surface water flooding or within a Critical Drainage Area Development in areas of surface water flooding should provide a drainage strategy which designs in multifunctional benefits including improvements in water quality biodiversity and amenity.	Accepted and text amended Accepted and text amended	Where a development proposal is for a site in an area at risk of fluvial or surface water flooding, or is within a Critical Drainage Area, a drainage strategy will be required to demonstrate how both on and off-site flood risk will be managed, and mitigation measures should be satisfactorily integrated into the design and layout of

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											<p>and biodiversity, as well as benefits for amenity in collaboration with the Lead Local Flood Authority, namely ECC. This approach supports betterment by turning flood risk mitigation into an opportunity for placemaking, green infrastructure and community resilience. This will be influenced by the preparation of a drainage strategy which should comply with the Sustainable Drainage Systems Guide for Essex.</p>	<p>and ponds must be retained in their natural or semi-natural form to maintain existing attenuation provision and existing flow paths.</p> <p>ECC require paragraph 21.28 is amended to read: ECC is the Lead Local Flood Authority (LLFA) and are responsible for surface water flooding. ECC's Interactive Flood and Water Management Map identifies Critical Drainage Areas (CDAs), these are areas, where multiple or interlinked sources of flood risk cause flooding during a severe rainfall event affecting people, property or infrastructure. Where a</p>											the development to provide betterment to the community by reducing flood risk. Any natural or semi-natural water features such as ditches, dykes and ponds must be retained in their natural or semi-natural form to maintain existing attenuation provision and existing flow paths. ECC is the Lead Local Flood Authority (LLFA) and are responsible for surface

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												<p>development proposal is within a CDA, a drainage strategy will be required to demonstrate how surface water flooding on site will be managed and how the site will mitigate the risk of increasing flooding downstream. Drainage strategies should comply with the Sustainable Drainage Systems Guide for Essex. ECC require paragraph 21.28 is amended to read:</p> <p>ECC is the Lead Local Flood Authority (LLFA) and are responsible for surface water flooding. ECC's Interactive Flood and Water Management Map identifies Critical Drainage Areas (CDAs), these</p>												water flooding. ECC's Interactive Flood and Water Management Map identifies Critical Drainage Areas (CDAs), these are areas, where multiple or interlinked sources of flood risk cause flooding during a severe rainfall event affecting people, property or infrastructure. Where a development proposal is within a CDA, a drainage strategy will be required to

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												<p>are areas, where multiple or interlinked sources of flood risk cause flooding during a severe rainfall event affecting people, property or infrastructure. Where a development proposal is within a CDA, a drainage strategy will be required to demonstrate how surface water flooding on site will be managed and how the site will mitigate the risk of increasing flooding downstream. Drainage strategies should comply with the Sustainable Drainage Systems Guide for Essex.</p> <p>In particular, sites within a CDA should ensure areas of hardstanding are permeable, consider</p>												<p>demonstrate how surface water flooding on site will be managed and how the site will mitigate the risk of increasing flooding downstream. Drainage strategies should comply with the Sustainable Drainage Systems Guide for Essex. In particular, sites within a CDA should ensure areas of hardstanding are permeable, consider rainwater harvesting, as well as discharging</p>

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												rainwater harvesting, as well as discharging surface water at the 1in1 year greenfield rate for all events up to the 1in100 event plus climate change. Sites should follow the drainage hierarchy and utilise above grounds SuDS where possible, including SuDS for conveyance and they should be included in the landscape strategy. In particular, sites within a CDA should ensure areas of hardstanding are permeable, consider rainwater harvesting, as well as discharging surface water at the 1in1 year greenfield rate for all events up to the 1in100 event plus climate change. Sites should follow								surface water at the 1in1 year greenfield rate for all events up to the 1in100 event plus climate change. Sites should follow the drainage hierarchy and utilise above grounds SuDS where possible, including SuDS for conveyance and they should be included in the landscape strategy. There are seven identified CDAs in Castle Point covering Most of the

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												the drainage hierarchy and utilise above grounds SuDS where possible, including SuDS for conveyance and they should be included in the landscape strategy.								Borough's land area. There are as follows....

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0282-0068	Organisation	Kevin	Fraser	Essex County Council	Yes	SD4	Not Stated		No	Justified, Effective	<p>ECC welcomes the inclusion of Policy SD4 which is based on the EPOA Planning Policy Statement – Operational Energy and Carbon (Net Zero), October 2025, which is based on strong evidence available on the Essex Design Guide.</p> <p>ECC does not support the recommendation of the Sustainability Appraisal (page 611), which states that the cost implications may be significant in comparison to other Development Management policy requirements and design improvements, and potentially significant enough affect viability in some circumstances. The policies are modelled on what would be most feasible for all major building typologies currently brought forward in Essex, which have all been found to be deliverable at minimal cost uplift by the Net Zero Carbon Viability and Toolkit Study that forms part of the Essex evidence base. As these policy standards are deliverable now, it is recommended that the added stipulation in Part A, paragraph 1 that ‘in exceptional circumstances, have an agreed strategy to achieve net zero within five years of occupation’ be removed. This is not found in the EPOA Planning Policy Statement and would add unnecessary burden on Planning Officers, who will have to follow up on non-compliant developments to ensure that they achieve net zero in operation within the five-year</p>	<p>ECC seek Policy SD4 is amended to read:</p> <p>Policy SD4 – Operational Energy and Carbon (Net Zero)</p> <p>ECC seeks the policy is updated to be consistent with the latest model policy draft, which has been enhanced following successful incorporation into recent Local Plans, which have been adopted (Tendring Colchester Borders Garden Community DPD) and been examined at examination to the satisfaction of the Inspector (Uttlesford Local Plan). The updated Policy has been provided to CPBC as part of this response in Appendix 2 ahead of its</p>	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	<p>Update the policy to be consistent with the latest model policy draft within the EPOA Planning Policy Statement-Operational Energy and Carbon (Net Zero) (October 2025), which has been enhanced following successful incorporation into recent Local Plans.</p> <p>Requests that the cost implications and impact on viability within the Sustainability Appraisal are reviewed to reflect the evidence from the Net Zero Carbon Viability and Toolkit study which states interventions provide minimal cost uplift.</p> <p>ECC welcome the embedding of the Essex model policies for net zero in the Plan. These will require to be updated by the latest policy position to be published in the Autumn 2025.</p> <p>To align with recent evidence additional criteria should be added that on large sites energy use intensity can be represented as a site wide residential</p>	<p>Accepted and text amended to reflect the recent EPOA Planning Policy Statement and the evidence base Net Zero Carbon Viability and Toolkit Study</p> <p>Accepted and text amended</p> <p>Accepted and typo corrected</p>	<p>A) New build development (residential and non-residential)</p> <p>All new buildings must shall be designed and built to be Net Zero Energy and Carbon in operation at occupation or, in exceptional circumstances, have an agreed strategy to achieve net zero within five years of occupation. They must be ultra-low energy buildings, fossil fuel free, and generate</p>

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											<p>window.</p> <p>Achieving net zero in operation during the post-occupancy phase after building completion would also be tantamount to retrofit. It is acknowledged within this Plan that 'retrofitting buildings is more disruptive, costly and time consuming than designing buildings to be net zero carbon in the first place.' (p. 181). To avoid such disruption for residents, this option to achieve the policy within five years should be removed</p> <p>It should be noted that there are already elements of flexibility within the EPOA Planning Policy Statement, without the need for this five-year extension. For example, there is the option to pay into an offsetting fund should the renewable energy demands of Requirement 4 not be met. The EPOA Planning Policy Statement will be further updated in Autumn 2025 and these revisions will also provide more flexibility. The latest version is attached in Appendix 2. These changes are explained in greater detail in the comment for 'p. 179-180, Policy SD4 – Net Zero Carbon Development (In Operation)' and it is encouraged that they be incorporated into Policy SD4.</p> <p>With these provisions for flexibility and the evidence that all the most prevalent typologies are deliverable to these standards now, non-compliant developments should not be given a five-year window</p>	<p>formal adoption and publishing on the Essex Design Guide in Autumn 2025</p> <p>In addition, ECC require Part A, paragraph 1 is amended to delete `in exceptional circumstances, have an agreed strategy to achieve net zero within five years of occupation' to be consistent with the latest EPOA Planning Policy Statement – Operational Energy and Carbon (Net Zero), October 2025 in Appendix 2:</p> <p>All new buildings must be designed and built to be Net Zero Energy and Carbon in operation at occupation or, in exceptional circumstances, have an agreed strategy to</p>					<p>average to provide flexibility.</p> <p>Request that renewable energy must be generated on site by roof top solar PV energy on all development Typo</p>		<p>renewable energy on-site to at least match predicted annual energy use.</p> <p>3. Requirement 3: Energy Use Intensity (EUI) limits</p> <p>The following non-residential buildings must achieve an Energy Use Intensity (EUI) of no more than the following (where technically feasible) by building type or nearest equivalent:</p> <ul style="list-style-type: none"> • Offices – 70

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											<p>to meet the policy. This degree of leniency is not expedient, considering the urgency of the climate crisis and local targets. It will ultimately delay the realisation of goals set by the Essex Climate Action Commission (ECAC), in its Net Zero: Making Essex Carbon Neutral Report (2021), that 'All new homes and all new commercial buildings granted planning permissions to be carbon zero by 2025' and 'All new homes and non-domestic buildings granted planning permission to be carbon positive by 2030.'</p> <p>3. Effective The updates to the EPOA Planning Policy Statement are being made for the following reasons. The technical evidence (Essex Net Zero Policy Study 2023) demonstrates that most residential typologies can achieve the standards set in the policy and generate sufficient renewable energy through rooftop solar PV on the basis of each individual home / building. This ensures that all residents have a home that meets the same standards and delivers the same benefits (e.g. healthy, energy efficient homes with low energy bills which are more resilient to a changing climate). The only exception where a residential typology will find it difficult to achieve all the policy requirements is the high-rise block of flats, as they would be unlikely to generate sufficient renewable energy to meet policy Requirement 4. In those cases, the energy offsetting</p>	<p>achieve net zero within five years of occupation. They must be ultra-low energy buildings, fossil fuel free, and generate renewable energy on-site to at least match predicted annual energy use.</p> <p>ECC welcome the embedding of the Essex model policies for net zero in the Plan. These will require to be updated by the latest policy position to be published in the Autumn 2025.</p> <p>In the interim, ECC require the following amendments to Policy SD4, which reflect the upcoming changes to the Essex model net zero policy. Insert additional clause under Requirement</p>								<p>kWh/m2 GIA/year;</p> <ul style="list-style-type: none"> Schools – 65 kWh/m2 GIA/year; Light Industrial – 35 kWh/m2 GIA/year; <p>On larger sites in exceptional circumstances this may be met on each individual phase as a site-wide residential average (weighted by floor area) provided that no single dwelling has an EUI greater than 45 kWh/m2 GIA/yr</p> <p>4. Requirement 4: Renewable energy</p>

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											<p>mechanism may justifiably be triggered and used to achieve policy compliance. Bungalows have a slightly more relaxed standard for space heating in recognition of their less efficient form.</p> <p>In the Uttlesford Local Plan (June/July 2025) examination, an exceptional circumstances clause was included in their equivalent policy to Policy SD4 which allowed larger residential schemes to achieve the energy use intensity target on a site average basis. ECC commissioned further evidence to explore the implications of the exceptions clause (See pages 28-40 Appendix 4, ECC Hearing Statement to Matter 4, Issue 1, Climate for Uttlesford Local Plan Examination). The conclusion was that the clause enabled the flexibility that developers desired but it had significant negative impacts unless some modifications were made. The evidence report advised on options that would modify the clause that would still allow flexibility but guard against the worst impacts. Therefore, the Climate and Planning Unit at ECC advise that it would be pragmatic to include such a clause (with the recommended modifications) as it brings the 'flexibility' which is welcomed by Inspectors and Industry.</p> <p>Another amendment to Policy SD4 should clarify what 'maximised' means as part of Requirement 4. The renewable energy requirement clause is</p>	<p>3b - New On larger sites in exceptional circumstances this may be met on each individual phase as a site-wide residential average (weighted by floor area) provided that no single dwelling has an EUI greater than 45 kWh/m2 GIA/yr.</p> <p>Amend Requirement 4, Paragraph 1 of Policy SD4 to read:</p> <p>Renewable energy must be generated on-site for all new developments by rooftop solar PV energy (electricity) generation and the amount of energy generated in a year should match or exceed the predicted annual energy use of the building, i.e.</p>											<p>must be generated on-site for all new developments by whichever of the following results in the greater amount of rooftop solar PV energy (electricity) generation: and</p> <p>a. The amount of energy generated in a year should match or exceed the predicted annual energy use of the building, i.e. Renewable energy generation (kWh/m2/year) = or > predicted annual</p>

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											also proposed to be simplified so that it just relates to achieving energy balance on-site (including offsetting where this is justifiably triggered) and does not go beyond this (unless a developer wishes to). There is a typo in Part B) Extensions and Conversations'. Amend to read 'Conversions'	Renewable energy generation (kWh/m2/year) = or > predicted annual energy use (kWh/m2/year) * In terms of calculation methods, the predicted annual energy use of a building / development would be expected to be calculated using predictive energy modelling, for residential buildings PHPP is often used, and for non-residential buildings often CIBSE TM54 methodology is used. The annual energy use of non-residential buildings can be predicted in a similar way to residential buildings by making assumptions based on the occupancy, typical use and							energy use (kWh/m2/year); or b. The amount of energy generated in a year is: • at least 80 kWh/m2 building footprint per annum* for all building types; and • at least 120 kWh/m2 building footprint per annum for industrial buildings. B) Extensions and Conversations Conversions

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												size of building. Amend Part B) to read: Extensions and Conversations Conversions								
0282-0069	Organisation	Kevin	Fraser	Essex County Council	Yes	Paragraph 21.41, Page 181	Not Stated		No	Effective	ECC seek paragraph 21.41 is updated to provide a link to the most up-to-date evidence base and implementation guidance documents. This will ensure the longevity of the references in the Plan.	ECC seek paragraph 21.41 is amended to read: Evidence commissioned by the ECAC demonstrates that building to the net zero carbon (in operation) standard set	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing vari	B	Provide links to most up-to-date evidence guidance on the Essex Design Guide Net Zero Evidence Base	Accepted and link updated		

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												out in Policy GEN1 is technically feasible; financially viable and legally justified. The evidence to support this policy is set out in the Essex Design Guide on the Net Zero Evidence page. The evidence will continue to be refreshed to help support and demonstrate the deliverability of net zero carbon development in Essex. Further information on the implementation of the policy can be viewed on the policy implementation page.			ous pieces of evidence				
02820070	Organisation	Kevin	Frasier	Essex County Council	Yes	SD5	Not Stated		No	Justified, Effective	ECC welcomes the inclusion of Policy SD5, which is based on Policy NZ2 in the EPOA Planning Policy Position for Net Zero Homes and Buildings in Greater Essex. Policy NZ2 was a 'placeholder policy for consultation purposes' until an Essex specific planning policy position for embodied carbon was prepared. The technical evidence to	ECC require the policy title is amended to read: Policy SD5 – Embodied Carbon and Circular Economy ECC require the	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containi	B	New evidence EPOA Planning Statement- Embodied Carbon and Circular Economy October 2025. Policy SP5 should be updated to "Embodied Carbon and Circular Economy" reflect this new evidence.	Accepted and policy title updated	Policy SD5 – Net Zero Carbon Development (Embodied Carbon and Circular Economy)

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											support an Essex specific embodied carbon policy was published in June 2024 (Essex Embodied Carbon Policy Study – available on the Essex Design Guide), and the EPOA Planning Policy Statement – Embodied Carbon and Circular Economy, October 2025 has recently been made available (see Appendix 3) and is likely to be finalised by the Autumn 2025. The EPOA Planning Policy Statement Embodied Carbon and Circular Economy is recommended to form the basis for SD5. This will ensure that SD5 is supported and justified by the technical evidence established for Greater Essex and also ensure SD5 is consistent with planning policies being developed across Greater Essex.	`placeholder policy' Policy SD5 is replaced with the Policy GE2 set out in the EPOA Planning Policy Statement – Embodied Carbon and Circular Economy, October 2025.			ng various pieces of evidence						
0282-0071	Organisation	Kevin	Frasier	Essex County Council	Yes	Paragraph 21.40, 2 nd sentence, Page 181	Not Stated		No	Effective		ECC seek an amendment to read: `..... was recommended by the Essex Climate Action Commission (ECAC) in July 2021.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Update evidence date to 2024	Text already states July 2024			

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0282-0072	Organisation	Kevin	Fraser	Essex County Council	Yes	Paragraph 21.41, 1st sentence, Page 181	Not Stated		No	Effective	Reference should be made to evidence base for Policy SD4 being located and updated on the Essex Design Guide	ECC require the 1st sentence is amended to read: Evidence commissioned by the Climate and Planning Unit of Essex County Council on behalf of all the Greater Essex local authorities to demonstrate that building to the net zero carbon (in operation) standard set out in Policy SD4 is published and updated where necessary on the Essex Design Guide)	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Reference Essex Design Guide in Policy SD4	Accepted and text amended	Evidence commissioned by the Climate and Planning Unit of Essex County Council on behalf of all the Greater Essex local authorities to demonstrate that building to the net zero carbon (in operation) standard set out in Policy SD4 is published and updated where necessary on the Essex Design Guide EGAG demonstrates that building to the net zero

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																			carbon (in operation) standard set out in Policy NZ1 is: <ul style="list-style-type: none"> • Technically feasible (Report 1: Essex Net Zero Policy – Technical Evidence Base by Introba, Etude, Currie & Brown, July 2023 and Report 2: Essex Net Zero Policy – Policy Summary, Evidence, and Validation Requirements by Introba, Etude, Currie & Brown July 2023); • Financially viable

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																			(Net Zero Carbon Viability Study for Essex by Three Dragons, August 2022); and the Net Zero Carbon Viability and Toolkit Study, Essex Climate Action Commission October 2025) and <ul style="list-style-type: none"> • Legally justified (Essex Open Legal Advice – Energy policy and Building Regulations by Estelle Dehon KC, Cornerstone Barristers, April 2023).

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0282-0073	Organisation	Kevin	Fraser	Essex County Council	Yes	Paragraph 21.43, Page 181	Not Stated		No	Justified, Effective	Paragraph 21.43 should be revised to state that the EPOA Embodied Carbon Embodied Policy Study has fed into this new EPOA Planning Policy Statement – Embodied Carbon and Circular Economy (October 2025) which sets out policy SD5. It should be made clear that this is the document to refer to when interpreting policy for SD5.	ECC require paragraph 21.43 is amended to read: The outcomes of this work have fed into the EPOA Planning Policy Statement – Operational Energy and Carbon (Net Zero) and EPOA Planning Policy Statement – Embodied Carbon and Circular Economy. These documents set out the Essex-wide model policies upon which policies SD4 and SD5 are based and the documents provide an explanation of each of the different policy requirements in detail. These documents should be referred to when interpreting policies SD4 and SD5 respectively.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Clarify that the EPOA Embodied Carbon Policy Study fed into the EPOA Planning Policy Statement – Embodied Carbon and Circular Economy (October 2025)	Accepted and text amended	The outcomes of this work have fed into the EPOA Planning Policy Statement Position – Operational Energy and Carbon (Net Zero) and EPOA Planning Policy Statement – Embodied Carbon and Circular Economy. These documents set out the Essex-wide model policies upon which policies SD4 and SD5 are based and the documents provide an explanation of

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																			each of the different policy requirements in detail. for Net Zero Carbon Homes and Buildings in Greater Essex document. This sets out policies SD4 and SD5 and provides an explanation of each of the different policy requirements in detail. This should be referred to when interpreting this policy. These documents should be referred to when interpreting

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																			policies SD4 and SD5 respectively.
02820074	Organisation	Kevin	Fraser	Essex County Council	Yes	SD9	Not Stated		No	Justified, Effective	Essex is a seriously water stressed area and it is important to maximise water efficiency in all new residential and non-residential development consistent with standards evidenced through a Water Cycle Study and the water industry. The Shared Standards in Water Efficiency for Local Plans (June 2025) is part of a joint initiative by Natural England, the Environment Agency, and water companies (Anglian Water, Cambridge Water, Essex and Suffolk Water and Affinity Water) endorsed by Water Resources East to support Local Planning Authorities (LPAs) to deliver sustainable growth. The Shared Standards provide advice and evidence to LPAs on how they can secure higher water efficiency standards for new homes and commercial developments. Suggested model policy wording is provided under the heading 'Draft policy: Water Resources and Sustainable Growth' (page 7). It is sought that these recommended policies be reviewed for potential inclusion in Policy SD9 to ensure it is more robust. 2. Justified CPBC should prepare an up-to-date Water Cycle Study to help evidence a potential water efficiency standard of 85 l/p/d of mains supplied	ECC seek that the model policies in the Shared Standards in Water Efficiency for Local Plans be reviewed and incorporated in Policy SD9, as appropriate. ECC recommend CPBC prepares an up-to-date Water Cycle Study to compile local evidence that demonstrates that water scarcity is having or is likely in the future to have an adverse impact on the environment and how water efficiency can protect the environment and support nature recovery, whilst not adversely affecting viability of development. CPBC should	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Essex is a water stressed area, recommends a water cycle study. Recommends that the model policies in the Shared Standards in Water Efficiency for Local Plans be reviewed and incorporated in Policy SD9, as appropriate. Recommends a water cycle study to establish water efficiency standards to be consistent with the shared standards in water efficiency developed by the water authorities, Environment Agency and Natural England and endorsed by Eater Resources East to address any water resources issues in Essex Recommends the preparation of a water cycle study to evidence a potential water efficiency standard of 85lppd as recommended by the Shared Standards. Recommends removal of the option to provide current building regulation water efficiency standards	CPBC has integrated the Shared Standard in Water Efficiency into SD9. These standards are supported by the research by Water Resources East, which also covers South Essex Water Resources East as an organisation covered the East of England including Essex and did extensive research into water resources in the region and their evidence base supports the efficiency standard of 85lppd to be applied across the region. CPBC has adopted the higher water efficiency standard of 85lppd within its policies as recommended by the Shared	1. All new residential development will be required to achieve a water efficiency standard of 85 90 litres per person per day of mains supplied water where it can be demonstrated that this is no feasible part G2 and regulation 36(2)(b) of the Building Regulations will apply. 2. All non-residential development

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											<p>water/potable water per person per day. The water efficiency standard of 90 l/p/d, is welcomed, but is higher than the recommended East of England 85 l/p/d Shared Standards in Water Efficiency for Local Plans. ECC seek no change to the 90 l/p/d target set in Policy SD9, as it is within the range suggested by the Shared Standards (p. 17), subject to any evidence provided through a water cycle study.</p> <p>However, the second sentence should be deleted as it weakens the policy intent to strengthen water efficiency. CPBC should prepare an up-to-date Water Cycle Study to compile local evidence that demonstrates that water scarcity is having or is likely in the future to have an adverse impact on the environment and how water efficiency can protect the environment and support nature recovery, whilst not adversely affecting viability of development. The Shared Standards for non-residential buildings are more stringent than those in Policy SD9. They provide evidence for the necessity of such requirements, as well as their feasibility and viability. As it is a more ambitious approach, it is required that the Shared Standards recommendations for non-residential buildings be adopted in Policy SD9 in place of criteria 2 - All non-residential development should achieve full credits for Wat 01 of BREEAM</p>	<p>prepare an up-to-date Water Cycle Study to help evidence a potential water efficiency standard of 85 l/p/d of mains supplied water/potable water per person per day. The water efficiency standard of 90 l/p/d, is welcomed, but is higher than the recommended East of England 85 l/p/d Shared Standards in Water Efficiency for Local Plans.</p> <p>ECC require Criteria 1 is amended to read:</p> <p>All new residential developments will be required to achieve a water efficiency standard of 90 litres per person per day of mains supplied water / potable water per person per</p>					<p>Recommended that the Shared Standards recommendations for water efficiency is applied to non-residential buildings. All development proposals to provide a Water Efficient Design Statement which should provide baseline information pre-development and full calculations of expected water use for the proposed development. Welcomes reference to Future Homes Hub Water Efficiency Report. The reasoned justification should reference the Shared Standards in Water Efficiency for Local Plans setting out its key recommendations. Typo in final sentence should be amended ECC requests a long justification paragraph explaining the Shared Standards in Water Efficiency and the application of 85lppd. Accepted typo corrected Accepted. Additional justification to support the policy should be provided.</p>	<p>Standards in Water Efficiency endorsed by Natural England, Environment Agency and Water Resources East. Amended text but included the higher efficiency standard. CPBC has commissioned some additional work on Waste Water Treatment Work Capacity within the Borough which will be implemented into the submitted plan. CPBC has adopted the higher water efficiency standard of 85lppd within its policies as recommended by the Shared Standards in Water Efficiency and is endorsed by Natural England, Environment Agency and South Essex Water Resources East prepared</p>	<p>should achieve full credits for Wat 01 of BREEAM. New, extended or redeveloped non-household ('non-household' means all development except residential dwellings.) buildings aim to achieve full credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) for BREEAM standard within a minimum score of 3 credits within WAT01</p>

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											<p>The Shared Standards also provide recommendations on how to demonstrate compliance, such as through the submission of a Water Efficient Design Statement. ECC recommend that similar clauses be included in Policy SD9 to provide more clarity to both policy officers and developers on the information that must be submitted to confirm that the policy has been met. ECC welcome reference to the Future Homes Hub Water Efficiency Report. The reasoned justification should reference the Shared Standards in Water Efficiency for Local Plans setting out its key recommendations. The reasoned justification should reference the Shared Standards in Water Efficiency for Local Plans setting out its key recommendations.</p>	<p>day . Where it can be demonstrated that this is not feasible part G2 and regulation 36(2)(b) of the Buildings Regulations will apply. ECC require the Shared Standards in Water Efficiency for Local Plans requirements for non-residential buildings be adopted in Policy SD9, Criteria 2:</p> <p>New, extended or redeveloped non-household ('non-household' means all development except residential dwellings.) buildings aim to achieve full credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) for BREAAAM standard within</p>							<p>evidence on water resources for the East of England including Essex and supports a water efficiency standard of 85llpd. Amended text but included the higher efficiency standard of 85llpd and removed the text which referenced part G2 and regulation 36(2)(b) of the Buildings Regulations will apply. CPBC has commissioned some additional work on Waste Water Treatment Work Capacity within the Borough which will be implemented into the submitted plan. Accepted and text amended to include all non-residential development to achieve full credits for Wat 01 of BREEAM. CPBC accepts the requirement of a Water</p>	<p>Water Consumption issue category, or an equivalent standard set out in any future update to BREAAAM. The applicant will be required to justify and evidence why full credits is not possible/viable for the development. 5. A Water Efficient Design Statement must be submitted with the application at the earliest stage to demonstrate how policy requirements have been met and will</p>

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												<p>a minimum score of 3 credits within WAT01 Water Consumption issue category, or an equivalent standard set out in any future update to BREAAAM. The applicant will be required to justify and evidence why full credits is not possible/viable for the development. ECC seek an additional Criteria be added to read:</p> <p>A Water Efficient Design Statement must be submitted with the application at the earliest stage to demonstrate how policy requirements have been met and will be maintained in relation to water efficient design. The statement shall provide, as a minimum, the</p>							Efficient Design Statement to demonstrate how water efficiency is met in development.	<p>be maintained in relation to water efficient design. The statement shall provide, as a minimum, the following:</p> <p>a) Baseline information relating to existing water use within a development site; and</p> <p>b) Full calculations relating to expected water use within a proposed development (such as water efficient fixtures and fittings, rainwater/stormwater</p>

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												<p>following:</p> <p>a) Baseline information relating to existing water use within a development site; and</p> <p>b) Full calculations relating to expected water use within a proposed development (such as water efficient fixtures and fittings, rainwater/stormwater harvesting and reuse, or greywater recycling). ECC recommend the typo in the final sentence is amended to read:</p> <p>The fittings approach is where water fittings and appliances are selected which have a capacity up to the maximum flow rate only.</p> <p>ECC</p>										<p>harvesting and reuse, or greywater recycling)</p> <p>..... The fittings approach is where water fittings and appliances are selected which have a capacity up to the maximum flow rate only. The Shared Standards in Water Efficiency for Local Plans (June 2025) set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity</p>

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												<p>recommend reference is made to the Shared Standards in a new paragraph to read: The Shared Standards in Water Efficiency for Local Plans (June 2025) are developed by Natural England, the Environment Agency, and water companies endorsed by Water Resources East to provide advice and evidence to Local Planning Authorities (LPAs) on how they can secure higher water efficiency standards for new homes and commercial developments. The key recommendations are:</p> <ul style="list-style-type: none"> • Water efficiency standards in new homes should aim to 												Water, the Environment Agency and Natural England, to provide advice and evidence to Local Planning Authorities (LPAs) on how they can secure higher water efficiency standards for new homes and commercial developments.

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												<p>achieve a design standard of up to 85 litres/person/day (l/p/d). Where there is insufficient justification for 85 l/p/d, for example on viability grounds or local environmental risks, a design standard that is more stringent than building regulations should be implemented such as 90 or 95 l/p/d.</p> <ul style="list-style-type: none"> • The tightest standards of water efficiency in new, extended or redeveloped non-household development should aim to achieve full credits in the BREEAM water calculator, with a minimum of 3 credits in WAT013. • All major non-household developments should include water saving measures and 									

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												<p>water reuse in their designs.</p> <ul style="list-style-type: none"> An up-to-date Water Cycle Study (WCS) should be conducted to compile local evidence that demonstrates that water scarcity is having or is likely in the future to have an adverse impact on the environment and how water efficiency can protect the environment and support nature recovery, whilst not adversely affecting viability of development. The LPA monitoring reports should be used to monitor the water efficiency policies to demonstrate the policies are being correctly followed and are effective. 												

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02820075	Organisation	Kevin	Fraser	Essex County Council	Yes	Chapter 22 - Monitoring Framework	Not Stated		No	Effective	<p>The Monitoring Table does not include a specific indicator to track the delivery of Supported and Specialist Housing (SSH), as raised in ECC's Regulation 18 response. Reference should be made to Policy Hou4 rather than Hou5 – Specialist Housing Requirements</p> <p>While the framework refers to “annual specific housing needs completions,” this terminology is not sufficiently clear to ensure effective monitoring of SSH delivery. ECC notes that this may be intended to capture SSH, but the wording does not explicitly reflect the range of accommodation types covered under Policy Hou4.</p> <p>The Plan does not currently include monitoring indicators for Policy Hou4, Criteria 1a to track the compliance with the M4(2) standard.</p> <p>The proposed amendment is supported by evidence in the Local Housing Needs Assessment (2023) and the Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025). Monitoring delivery of SSH is necessary to demonstrate how the Plan supports ECC's commissioning priorities and statutory duties under the Care Act 2014 and Children Act 1989. It also supports consistency with NPPF, paragraph 63, which requires Plans to establish need, the size, type and tenure of</p>	<p>ECC require the replacement of the following monitoring indicator to be consistent with the indicator for SD4</p> <p>Number of Whole Life Cycle Carbon Assessments submitted meeting all targets</p> <p>and replace with</p> <p>Number of buildings designed to lower embodied carbon and meet upfront embodied carbon emissions targets .</p> <p>ECC requires the following amendment to Monitoring Indicators 16 and 18 to read:</p> <p>Policy Hou45 – Specialist Housing Requirements Monitoring Indicator</p> <ul style="list-style-type: none"> • % of all new 	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	<p>Requires an alternative monitoring indicator of the number of buildings designed to lower embodied carbon and meet upfront embodied carbon emissions targets</p> <p>Requires the addition of monitoring indicator of the annual delivery of retirement, sheltered homes by tenure and the annual delivery of extra care units by tenure</p> <p>Requires that Supported and Specialist housing M4(3) to be reported within the monitoring of development Need to add a monitoring indicator for Policy HOU4 to track annual delivery of specialist housing types. Change to reference nursing care beds rather than extra care beds</p> <p>Include additional monitoring criteria to track health and wellbeing outcomes.</p>	Accepted and monitoring indicator added CPBC agrees to add a further monitoring indicator for specialist housing requirements Accepted and text amended for monitoring to include the percentage of M4 (3) standard housing have been provided within the development Accepted and text amended and monitoring indicator added to track annual delivery of specialist housing in annual monitoring reports Accepted. Additional monitoring indicators around hot takeaway planning applications included and additional text referencing INFRA3 for submission of health impact assessments	<p>Number of Whole Life Cycle Carbon Assessments submitted meeting all targets</p> <p>Number of buildings designed to lower embodied carbon and meet upfront embodied carbon emissions targets</p> <p>Annual Specific Housing Needs Completions % of all new homes built to standard M4(3) Annual delivery of retirement, sheltered homes Annual delivery of extra care units</p> <p>Submissi</p>

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											<p>housing needed for different groups in the community including affordable housing (including Social Rent); families with children; looked after children, older people (including those who require retirement housing, housing with-care and care homes); and people with disabilities.</p> <p>The Monitoring Table does not include a specific indicator to track the delivery of Supported and Specialist Housing (SSH), as raised in ECC's Regulation 18 response. Reference should be made to Policy Hou4 rather than Hou5 – Specialist Housing Requirements. While the framework refers to “annual specific housing needs completions,” this terminology is not sufficiently clear to ensure effective monitoring of SSH delivery. ECC notes that this may be intended to capture SSH, but the wording does not explicitly reflect the range of accommodation types covered under Policy Hou4.</p> <p>The Plan does not currently include monitoring indicators for Policy Hou4, Criteria 1b to track the compliance with the M4(3) standard.</p> <p>Monitoring delivery of SSH is necessary to demonstrate how the Plan supports ECC's commissioning priorities and statutory duties under the Care Act 2014 and Children Act 1989. It also supports consistency</p>	<p>homes built to standard M4(2) ECC requires the following amendment to Monitoring Indicators 16 and 18 to read:</p> <p>Policy Hou45 – Specialist Housing Requirements Monitoring Indicator</p> <ul style="list-style-type: none"> • % of all new homes built to standard M4(3) ECC requires the following amendment to Monitoring Indicators 16 and 18 to read: <p>Policy Hou45 – Specialist Housing Requirements</p> <p>Monitoring Indicator</p> <ul style="list-style-type: none"> • the annual delivery of retirement, sheltered homes by tenure • the annual delivery of extra care units by tenure <p>ECC requires the following amendment to</p>							<p>on of Health Impact Assessments</p> <p>Number of Health Impact Assessments submitted in accordance with Policy Infra3</p> <p>Number of Health Impact Assessment for Hot Food Takeaway Applications in accordance with Policy TC5</p> <p>Number of Hot Food Takeaway Applications refused in accordance with Policy TC5</p>		

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											<p>with NPPF, paragraph 63, which requires Plans to establish need, the size, type and tenure of housing needed for different groups in the community including affordable housing (including Social Rent); families with children; looked after children, older people (including those who require retirement housing, housing with-care and care homes); and people with disabilities.</p> <p>The Monitoring Table does not include a specific indicator to track the delivery of Supported and Specialist Housing (SSH), as raised in ECC's Regulation 18 response.</p> <p>Reference should be made to Policy Hou4 rather than Hou5 – Specialist Housing Requirements.</p> <p>While the framework refers to “annual specific housing needs completions,” this terminology is not sufficiently clear to ensure effective monitoring of SSH delivery. ECC notes that this may be intended to capture SSH, but the wording does not explicitly reflect the range of accommodation types covered under Policy Hou4.</p> <p>The Plan does not currently include monitoring indicators for Policy Hou4, Criteria 2a to track the annual delivery of specialist housing by type and tenure of retirement sheltered homes.</p> <p>Monitoring delivery of SSH is necessary to demonstrate how the Plan supports ECC's</p>	<p>Monitoring Indicators 16 and 18 to read:</p> <p>Policy Hou45 – Specialist Housing Requirements</p> <p>Monitoring Indicator</p> <ul style="list-style-type: none"> the annual delivery of residential care beds by tenure the annual delivery of nursing care beds by tenure <p>ECC recommend including the following indicators:</p> <ul style="list-style-type: none"> Number of Health Impact Assessments submitted in accordance with Policy Infra3 Submission of Health Impact Assessment for Hot Food Takeaway Applications in accordance with Policy TC5 Number of Hot Food Takeaway Applications 							

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											<p>commissioning priorities and statutory duties under the Care Act 2014 and Children Act 1989. It also supports consistency with NPPF, paragraph 63, which requires Plans to establish need, the size, type and tenure of housing needed for different groups in the community including affordable housing (including Social Rent); families with children; looked after children, older people (including those who require retirement housing, housing with-care and care homes); and people with disabilities.</p> <p>The Monitoring Table does not include a specific indicator to track the delivery of Supported and Specialist Housing (SSH), as raised in ECC's Regulation 18 response. Reference should be made to Policy Hou4 rather than Hou5 – Specialist Housing Requirements</p> <p>While the framework refers to "annual specific housing needs completions," this terminology is not sufficiently clear to ensure effective monitoring of SSH delivery. ECC notes that this may be intended to capture SSH, but the wording does not explicitly reflect the range of accommodation types covered under Policy Hou4.</p> <p>The indicator for Criteria 2b should reflect the required ECC amendment to Policy Hou4, Criteria 2b to reference 'nursing care beds' rather than 'extra care beds', which is consistent with national policy and ECC's</p>	refused in accordance with Policy TC5												

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											<p>statutory duties.</p> <p>The Plan does not currently include monitoring indicators for Policy Hou4, Criteria 2b to track the annual delivery of specialist housing by type and tenure of residential care beds and nursing care beds.</p> <p>Monitoring delivery of SSH is necessary to demonstrate how the Plan supports ECC's commissioning priorities and statutory duties under the Care Act 2014 and Children Act 1989. It also supports consistency with NPPF, paragraph 63, which requires Plans to establish need, the size, type and tenure of housing needed for different groups in the community including affordable housing (including Social Rent); families with children; looked after children, older people (including those who require retirement housing, housing with-care and care homes); and people with disabilities.</p> <p>ECC recommend including a monitoring indicator for Policy TC5 under Objective 19 which seeks to secure health and wellbeing outcomes.</p> <p>Castle Point Plan Objective 19: Secure improved health and wellbeing outcomes for residents enabling more active and healthier lifestyles, creating healthy living environments and reducing health inequalities</p>									

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02820076	Organisation	Kevin	Fraser	Essex County Council	Yes	Policies Map	Not Stated		No	Effective, Consistent with National Policy	<p>Policy GB1, Criteria 1 states that the Green Belt boundaries are defined on the Policies Map and that development within the Green Belt will not be supported in line with the NPPF. ECC requires that school sites are removed from the Green Belt, where appropriate to enable any future school expansion necessary to meet pupil demand not being required to demonstrate an 'exceptional circumstance' to development in the Green Belt. Any school sites removed from the Green Belt should then be allocated as education land on the Policies Map. Paragraph 43 of the Inspectors Report to the 'withdrawn' Local Plan stated there were exceptional circumstances for the removal of Glenwood School site and the land at the Cornelius Vermuyden School from the Green Belt given the extent to which they are built up, and that it was unnecessary to keep these sites permanently open. Similarly, the built-up areas of the USP Canvey College Campus and the former Castle View School; Deanes School and Virgin Active, Hadleigh; and the King John School, Benfleet were recommended to be removed from the Green Belt but there were not exceptional circumstances for the removal of the playing fields associated with these schools. This was confirmed in Main Modification 67 which identified the sites to be removed from the Green Belt and the boundaries re-</p>	<p>ECC supports the recommendations of the Inspector into the 'withdrawn' Local Plan and the recommendations of the Green Belt Assessment, Schools in the Green Belt. ECC seek:</p> <ul style="list-style-type: none"> • the General Boundary Issues, paragraph 17.9 be amended to provide commentary with regards the status of these school sites and the Green Belt • the Policies Map is amended to identify existing education sites • the Policies Map is amended to identify any additional education sites once a cumulative assessment of the growth in the Plan is undertaken 	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	<p>Considers that existing and potential new schools, if required to meet growth in the plan, should not be considered as an "exceptional circumstance" to development in Green Belt to allow them to expand to meet pupil demand if required. ECC accepts that there were not exceptional circumstances for the removal of the playing fields associated with these schools from the Green Belt. This was accepted in the previous withdrawn plan by its Inspector and is further highlighted in the CPBC Green Belt Assessment, paragraph 3.3.5. These sites should be removed from the Green Belt on the Policies Map.</p> <p>Request these existing school sites are allocated as education land on the policies map to strengthen the implementation of Policy Infra2.</p> <p>Require that Mineral Safeguarding Areas are identified on the Policies Map.</p>	<p>Not accepted. The Castle Point Plan is a new plan and has been prepared in different circumstances to the previous withdrawn plan. The new plan proposes a new housing strategy of urban intensification consequently the Green Belt becomes more significant as the Green Belt tightly bounds the existing urban areas and there is limited green space in Castle Point. As all these sites are within designated Green Belt, the Council considers that further development of these sites is not acceptable. Accepted and Maps updated with information. Accepted and maps updated</p>	<p>Add Mineral Safeguarding Areas to Policy Map Remove school playing fields from open space designation Add existing 'Educational Establishments' to the Policies Map</p>

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											<p>aligned appropriately. These school sites were: King John School, Benfleet; • The Deanes School, Benfleet; • Glenwood School, Benfleet; • Kents Hill Infants and Junior School, Benfleet; • Holy Family Catholic Primary School, Benfleet; • Robert Drake Primary School, Benfleet; • Canvey Skills Campus / Procat, Canvey Island; and • Cornelius Vermuyden, Canvey Island.</p> <p>This approach is further supported by the Green Belt Assessment, Schools in the Green Belt, paragraph 3.3.5 which provides support for the conclusions of the examining Inspector of the Borough's previous and withdrawn Local Plan. The Inspectors Report recommended that the Policies Map be amended accordingly. The scale of the Policies Map does not provide the certainty to ECC that these sites have been removed from the Green Belt.</p> <p>The Policies Map should also annotate land that is allocated for educational use to enable and strengthen the implementation of Policy Infra2, which seeks to protect and/or enable the re-use of educational establishments where ECC has indicated they are surplus to educational requirements. The Policies Map should also be amended to allocate any additional education sites once</p>	(see response to Policy Infra2 – Education, Skills and Learning, paragraph 19.20) ECC require the Mineral Safeguarding Areas are identified on the Policies Map. ECC require reference to school playing fields being defined as public open space on the Policies Map should be deleted.									

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											<p>a further cumulative assessment of the growth in the Plan has been undertaken. ECC note that MSAs are not identified on the Policies Map on page 194 of the Plan.</p> <p>Planning Policy Guidance (PPG), section 27 defines the role that planning authorities have in safeguarding mineral resources, stating that district councils should show Mineral Safeguarding Areas (MSAs) on their policy maps (PPG Reference ID 27-005-20140306).</p> <p>This is to ensure that known locations of specific minerals are not needlessly sterilised by other forms of development, whilst not creating a presumption that the defined resources will ever be worked.</p> <p>ECC requires the Policies Map to be amended to remove the designation of school playing fields as public open space. School playing fields are not considered public open space in the same way as parks or village greens. While some schools may allow community access to their playing fields, they are primarily intended for the physical education and recreation of the students who attend the school. Government guidance on school land says that school playing fields are provided for the benefit of pupils and their enjoyment, and any community use is usually at the school's discretion. There is</p>													

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											a strong policy presumption against the disposal or change of use of school playing field land, and the Secretary of State's prior consent is needed for any such action.								
02820077	Organisation	Kevin	Fraser	Essex County Council	Yes	Glossary	Not Stated		No	Effective	ECC seek amendment to the Glossary to provide clarification that education is not defined as being community use and thereby subject to Policy Infra1. Educational establishments and libraries should be protected for their existing use and any change of use only permitted if it has been identified by ECC or other educational providers as being surplus to educational requirements consistent with Policy Infra2.	ECC require the Glossary is amended to delete the following from the definition of Community Facilities. • Schools, Colleges and other educational facilities • Libraries and	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing vari	B	For Education not be defined as a community use in the glossary	Accepted and Schools, colleges and Educational Facilities be removed from community use definition in glossary	Community Facilities: Are buildings, which enable a variety or local activity to take place including, but not limited

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											The Glossary refers to schools, colleges and other educational facilities; Childcare centres and libraries as being community uses and therefore subject to Policy Infra1, which should be deleted. These uses should be covered by Policy Infra2– Education, Skills and Learning.	community centres • Child care centres			ous pieces of evidence				to, the following: • Schools, Colleges and other education at facilities • Libraries and community centres...

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02820078	Organisation	Kevin	Fraser	Essex County Council	Yes	Infrastructure Delivery Plan	Not Stated		No	Positively prepared, justified, effective, consistent with national policy	<p>ECC has input to the baseline IDP Baseline Review (2024) and the IDP, May 2025 with regards ECC's roles and responsibilities.</p> <p>The published IDP (May 2025) is not based on the infrastructure requirements required to deliver either Government's standard methodology housing requirements or the CPBC 6,196 homes, as set out in Policy SP3 but three growth scenarios ranging between 4,862 to 8,845 homes, including some development in the Green Belt. ECC provided CPBC with an assessment of these scenarios regarding primary, secondary and early years and childcare. Other assumptions were made by the consultant on other services based on the Developers' Guide (2024). It is noted that this iteration excludes transport costs as the Transport Assessment and Addendum (West Canvey) were still being drafted and had not been reviewed by ECC.</p> <p>Paragraph 19.20 of the Plan refers to the IDP establishing where new educational facilities are required based on the growth identified within the Plan. Policy SP3 sets out how the Plan is seeking to deliver 6,196 homes with a spatial distribution and scale of specific sites/broad locations different to the IDP Scenarios previously assessed. ECC considers such differences will have a significant impact on the overall infrastructure requirements,</p>	<p>Prior to submission of the Plan, the IDP will require a significant update to fully reflect the evidence base referenced in the Plan, as a significant amount has been undertaken since the latest IDP.</p> <p>ECC will need to undertake a cumulative assessment of the growth for education and early years and childcare and assist to identify the necessary highway and transportation interventions necessary, along with any other relevant ECC roles and responsibilities.</p> <p>ECC was not provided with the opportunity to comprehensively review the completed TA (including its</p>	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	<p>ECC has reviewed the IDP May 2025, however, there have been some additional changes to housing strategy with the addition of new sites including a large site at West Canvey. There has also been updated evidence following May 2025. All of this needs to be fed into an updated IDP for ECC to review prior to submission of the plan for examination Requests some additional amendments to Chapter 11 of the IDP including reference to the upgrading of RCHW facilities at Canvey, references to the adopted Waste Strategy for Essex (2024), a need for change waste management approaches</p>	<p>CPBC have provided ECC with updated data for the cumulative assessment of primary, secondary and early years education and childcare and SEND.</p> <p>In January 2026, ECC provided addendums to the education assessments previously undertaken in November 2025.</p> <p>The West Canvey IDP has been provided to ECC for comment and comments provided, which require review by CPBC.</p> <p>CPBC are preparing an update to the IDP which will be one consolidated report (including relevant sections of the May 2025 and West Canvey Addendum October 2025) and address any</p>	

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											<p>specific site policy infrastructure requirements and potentially Whole Plan Viability Assessment.</p> <p>Whilst the strategy remains 'urban focussed' the allocated sites informing the IDP, May 2025 and site allocations in the Plan differ in terms of scale and their distribution. These disparities are further contained within the IDP/Transport Assessment and the Plan (including Site Policies) and the Housing Capacity Topic Paper.</p> <p>The Sustainability Appraisal, paragraph 28, bullet 1 infers that the plan policy position and Scenario 1 in the IDP are similar. In fact, there are significant differences in that some sites have been removed from the Plan and some 16 sites have been subject to significant change, which will impact on any infrastructure requirements. For example, West Canvey has increased from 1,000 to 2,700 homes (of which 700 post 2043) and Canvey Town Centre has increased from 200 to 820 homes.</p> <p>CPBC did not request or provide the relevant information for ECC to undertake the required cumulative assessment of the growth in the Plan, with regards its potential impact on education and early years and childcare places. This is required to be undertaken prior to submission consistent with</p>	<p>Appendices) and the West Canvey Addendum (August 2025), with the latter published post commencement of the consultation. ECC has instructed Essex Highways to review these documents and their full report has informed the response to this consultation. Any revised assessment will need to inform the next iteration of the IDP.</p> <p>The revised IDP will need to inform a review of the Whole Plan Viability Assessment which assesses the viability of the Castle Point Plan, taking into account policy requirements. ECC, as the WDA seek the following amendments:</p>						<p>outstanding issues including new and/or updated evidence that has been published and/or completed since that which informed the IDP May 2025. Some examples are set out in the ECC Regulation 19 response and include the Transport assessment and further education assessment. The final IDP will be made available to ECC to review.</p> <p>CPBC and ECC acknowledge that the soundness and legal compliance of the Castle Point Plan and its supporting evidence, including the IDP and Transport Assessment, will be considered by an independent Inspector appointed to examine the</p>	

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											<p>Section 3.4 of the Essex County Council Local and Neighbourhood Planners' Guide to School Organisation and Place Planning (February 2025).</p> <p>To demonstrate potential implications, ECC, as the lead authority for Education, has undertaken a 'high-level' assessment of the Plan growth (see Appendix 4). The assessment identifies the following changes in requirements:</p> <ul style="list-style-type: none"> • Consultation Plan – identifies the need for two 56 place early years and childcare nurseries and primary provision (non-defined). • ECC assessment – identifies the need for at least a new 2FE primary school; three new 72 place nurseries, of which one should be co-located with the primary school; one stand-alone 56 place nursery and potentially two further stand-alone 30 place nurseries subject to land being made available by developers. Other developer contributions where there are insufficient places to meet the generated demand. <p>In addition, significant evidence base referenced in the Plan has been completed post the preparation of the IDP, May 2025, including the updated Developers' Guide (September 2025); Castle Point LCWIP; Essex Wide LCWIP; Transport Assessment (July 2025) and West Canvey Addendum (August 2025); Local Transport</p>	<p>Paragraph 11.1.3</p> <p>The WDA prepares the necessary strategies, infrastructure and contractual arrangements for the management of local authority collected waste to support the delivery of the current Waste Strategy for Essex (WSfE). The WSfE for Essex sets the vision for the management of waste collection. The core focus of the WSfE JMWMS is to ensure the establishment of appropriate waste</p> <p>Paragraph 11.1.4</p> <p>Paragraph 11.1.5</p> <p>The WSfE recognises that waste</p>						<p>Plan and will continue to work together to address outstanding matters as far as possible."</p> <p>Accepted and inserted into IDP</p> <p>ECC has reviewed a draft West Canvey IDP update and provided comments along with a further education assessment to reflect the full policy requirement of 2,700 homes, rather than the 2,000 within the plan period.</p> <p>In January 2026, ECC provided addendums to the education assessments previously undertaken in November 2025.</p> <p>CPBC are preparing an update to the IDP which will be one consolidated report (including relevant sections of the</p>	

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											<p>Plan A Better Connected Essex Transport Strategy (July 2025) and South Essex Implementation Strategy (July 2025); Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025); ELNRS (July 2025); and Shared Standards in Water Efficiency (June 2025).</p> <p>CPBC and its consultants Systra have held regular meetings with ECC with regards the preparation of the transportation evidence base. The TA Scoping Report was reviewed by ECC and considered an appropriate piece of evidence to support the Regulation 18 Consultation (Issues and Options – July – September 2024). However, ECC was not provided with the opportunity to comprehensively review the completed TA (including its Appendices) and the West Canvey Addendum (August 2025), with the latter published post commencement of the consultation. An update to the Transport Assessment (TA), Transport Assessment Addendum; and Green Belt Sites Assessment will be required to address the issues, observations and queries identified following the ECC review of these documents (see Appendix 5) and will subsequently inform an update to the IDP. The Submission Plan must be supported by an up-to-date IDP that reflects updated</p>	<p>management approaches need to change, which is expected to may necessitate new or expanded waste management infrastructure.</p> <p>Paragraph 11.2.5</p> <p>The Essex Developers Guide to Infrastructure Contributions details the scope and range of contributions Essex County Council may seek from developers and land owners to mitigate the impact of developments on waste management infrastructure.</p> <p>11.4 Evidence base:</p> <ul style="list-style-type: none"> ECC Developers' Guide to Infrastructure Contributions, ECC, 20254 							<p>May 2025 and West Canvey Addendum (October 2025) and address any outstanding issues including new and/or updated evidence that has been published and/or completed since that which informed the IDP May 2025. Some examples are set out in the ECC Regulation 19 response and include the Transport assessment and further education assessment. The final IDP will be made available to ECC to review.</p> <p>CPBC and ECC acknowledge that the soundness and legal compliance of the Castle Point Plan and its supporting evidence, including the IDP and Transport Assessment, will be considered</p>	

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											<p>information consistent with that iteration of the Plan, which will need to be agreed with ECC as a primary infrastructure provider prior to submission.</p> <p>With regards Chapter 11 – Waste Management, ECC, as the Waste Disposal Authority, would welcome the opportunity to review the IDP prior to submission. The WDA supports the following references in the IDP May 2025:</p> <ul style="list-style-type: none"> paragraph 11.2.2 - ECC through the new WSfE is exploring the need for and options available for the provision of new and additional waste transfer, bulking and haulage infrastructure capacity within South Essex. A new long-term residual waste solution is required which depending on the location may require waste infrastructure for bulking and haulage in the South of Essex. While there are currently no specific plans for new or expanded waste infrastructure, requirements will emerge during WSfE action planning. The WDA aim to explore the potential employment land that may be suitable for the provision of new WDA logistical waste infrastructure within South Essex. paragraph 11.2.3 - existing RCHW facilities do not match the level of growth being planned in the County and will be a challenge to meet current demand and potentially worse with more growth. ECC, as the WDA, is exploring the potential 	<p>Paragraph 11.5.3</p> <p>This could be co-located with a WCA depot and/or RCHW facility and we are keen to explore opportunities for joint working with Castle Point Borough Council where possible.</p>								by an independent Inspector appointed to examine the Plan and will continue to work together to address outstanding matters as far as possible."	

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											<p>for upgrading RCHW provision to improve facilities available for residents and businesses.</p> <ul style="list-style-type: none"> paragraph 11.2.4 - there will be a need to explore the options for upgrading the Canvey RCHW's and new or additional sites to serve the Borough and adjacent areas. <p>The WDA would like to highlight a number of amendments in advance of any update to the IDP:</p> <ul style="list-style-type: none"> references to the adopted Waste Strategy for Essex (2024) – paragraphs 11.1.3, 11.1.4, 11.4 more positive need to change waste management approaches – paragraph 11.1.5 update reference to the Essex Developers Guide to Infrastructure Contributions (2025) with updated advice regarding waste management – paragraphs 11.2.5, 11.4 South Essex sub-region lacks the required level of waste infrastructure for the efficient movement of waste from source to treatment facilities. A new transfer station capacity is required which could be co-located with a WCA depot and/or RCHW facility. – paragraph 11.5.3 											

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02820079	Organisation	Kevin	Fraser	Essex County Council	Yes	SFR A	Not Stated		No	Effective	<p>ECC seek the Strategic Flood Risk Assessment (SFRA) is reviewed to take account of a number of technical matters including a climate change allowance of 45% rather than 40% consistent with Environment Agency guidance and the ECC SuDS Design Guide; identify whether sites are located in a Critical Drainage Area; seek to provide for rainwater harvesting, where possible; reflect acceptable discharge rates; provide betterment to reduce the risk of downstream flooding; and reference the Sustainable Drainage Systems Design Guide for Essex (2020), which is in line with the national CIRIA SuDS Manual.</p> <p>Site assessment proformas have been prepared for sites that have been identified to be within Flood Zone 2 and/or Flood Zone 3 or have access routes within the Flood Zones. The proformas should refer to a climate change allowance of 45% rather than 40% consistent with Environment Agency guidance. The Essex SuDS Design Guide , prepared by the LLFA, expects the Upper End climate change allowances to be used depending on the catchment area. This Upper end allowance for peak rainfall intensity in small and urban catchments (Combined Essex, South Essex) is 45% total percentage change anticipated for the 2050s (a lifetime up to 2060). This is consistent with</p>	<p>Reference should be made to a climate change allowance of 45% rather than 40% consistent with Environment Agency guidance and the Essex SuDS Design Guide. ECC seek the following requirements to be required for all potential development sites:</p> <ul style="list-style-type: none"> • Sites should be identified as being located within a Critical Drainage Area, and should have permeable hardstanding surfaces and the provision of rainwater harvesting, where possible. • All sites should provide source control of surface water and should consider the conveyance hierarchy as per the 	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Require the SFRA to be updated to include a climate change allowance of 45% rather than 40% and to identify whether sites are located in critical drainage areas and reference Sustainable Drainage Systems Design Guide for Essex (2020). LLFA provided a list of some specific sites to review including: Richmond Ave Car Park, Knightswick Shopping Centre, Canvey Library and Barclays ,Grouts and Land to the Rear, Land above The Paddocks, Oak Road Car park, Venables Close, Canvey Job Centre, Former Admiral Jellicoe, Land to the Rear of North Avenue Essex Coachworks Former Council Offices, Corner of Little Gypps and Willow Close, Ozonia Gardens, Eastern Esplanade, Land between Station Rd and Seaview Road, Matrix House, Lionel Rd, Kushi, Furtherwick Road	The SFRA has been updated to resolve all issues aside from including a climate change allowance of 45%. This is currently ongoing. CPBC and ECC acknowledge that the soundness and legal compliance of the Castle Point Plan and its supporting evidence, including the SFRA, will be considered by an independent Inspector appointed to examine the Plan and will continue to work together to address outstanding matters as far as possible.". The SFRA has been updated to identify sites which are located in a critical drainage area with reference to the guidance provided in the Sustainable Drainage	

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											<p>the Environment Agency guidance as set out in the EA Peak rainfall intensity allowance.</p> <p>The SFRA should also identify which sites are located within a Critical Drainage Area (CDA) as set out below:</p> <ul style="list-style-type: none"> Richmond Ave Car Park - refer to a climate change allowance of 45%. The site is located within a CDA. a drainage strategy will need to consider rainwater harvesting and all areas of hardstanding should be required to be permeable. Knightswick Shopping Centre - refer to a climate change allowance of 45%, the northern part of the site is located within a CDA. A drainage strategy will need to consider rainwater harvesting and all areas of hardstanding should be required to be permeable. Canvey Library and Barclays - refer to a climate change allowance of 45%. The site is located within a CDA. A drainage strategy will need to consider rainwater harvesting and all areas of hardstanding should be required to be permeable. Grouts and Land to the Rear - refer to a climate change allowance of 45% The site is located within a CDA. A drainage strategy will need to consider rainwater harvesting and all areas of hardstanding should be required to be permeable. Land above The Paddocks – if the site is an upward extension 	<p>updated SuDS Guidance Document.</p> <ul style="list-style-type: none"> Sites in Critical Drainage Areas should discharge at the 1in1 Greenfield rate for all events up to the 1in100 event plus climate change. Where sites have a surface water flow path consideration should be given as to what betterment can be provided to reduce the risk of downstream flooding. Reference should be made to the Sustainable Drainage Systems Design Guide for Essex (2020), which is in line with the national CIRIA SuDS Manual. It provides details of the standards and guidance on the planning, design and delivery of 				whether the site is within a critical drainage area and provide criteria as outlined in Sustainable Systems Design Guide for Essex (2020). All sites should consider sources of surface water and provide controls.	Systems Design Guide for Essex (2020) The Level 2 SFRA has been updated with the 45% peak rainfall intensity, The Level 2 SFRA has been updated to consider sites within critical drainage areas and for the control surface water sources to be considered.		

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											<p>to the building then a drainage strategy will not be required given there would be no increase in hardstanding.</p> <ul style="list-style-type: none"> • Oak Road Car park - the drainage strategy will be required to evidence how the pools of surface water will be dealt with and ensure any development does not increase flood risk elsewhere. • Venables Close - refer to a climate change allowance of 45%. If development is built on the area of surface water flood risk the drainage strategy will be required to evidence how that surface water will be managed and should not increase flood risk elsewhere. • Canvey Job Centre - refer to a climate change allowance of 45%. • Land at the Point - refer to a climate change allowance of 45%. Any development within the flood zones should evidence how surface water will be managed. • Former Admiral Jellicoe - refer to a climate change allowance of 45%. The site is located within a CDA. A drainage strategy will need to consider rainwater harvesting and all areas of hardstanding should be required to be permeable. • Land to the Rear of North Avenue - refer to a climate change allowance of 45%. Where there are areas of surface water flooding a drainage strategy must evidence how these will be dealt with without increasing the risk of flooding elsewhere. 	attractive and high-quality sustainable drainage systems (SuDS) schemes providing multiple benefits to the environment and community.								

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											<ul style="list-style-type: none"> • Essex Coachworks - refer to a climate change allowance of 45%. • Former Council Offices, Long Road - refer to a climate change allowance of 45%. • Corner of Little Gypps and Willow Close - refer to a climate change allowance of 45%. The drainage strategy should evidence how surface water flows will be managed. • Ozonia Gardens, Eastern Esplanade - refer to a climate change allowance of 45%. A Drainage strategy should evidence how surface water will be dealt with. Discharge to the sea can be at unrestricted rates. • Land between Station Rd and Seaview Road - refer to a climate change allowance of 45%. The drainage strategy should evidence how surface water will be managed. Discharge to the sea can be unrestricted. • Matrix House, Lionel Rd - refer to a climate change allowance of 45%. The site is located within a CDA. A drainage strategy will need to consider rainwater harvesting and all areas of hardstanding should be required to be permeable. • Kushi, Furtherwick Road - refer to a climate change allowance of 45%. The site is located within a CDA. A drainage strategy will need to consider rainwater harvesting and all areas of hardstanding should be required to be permeable. <p>The Essex SuDS Design Guide , prepared by the Lead Local</p>										

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											Flood Authority (LLFA), expects the Upper End climate change allowances to be used depending on the catchment area. This Upper end allowance for peak rainfall intensity in small and urban catchments (Combined Essex, South Essex) is 45% total percentage change anticipated for the 2050s (a lifetime up to 2060). This is consistent with the Environment Agency guidance as set out in the EA Peak rainfall intensity allowance. 3. Effective Paragraph 4.1.2 sets out the requirements for all potential development sites. Additional bullets should include whether a site is located within a Critical Drainage Area (reference to permeable hardstanding and rainwater harvesting); all sites should provide source control of surface water and should consider the conveyance hierarchy; sites in CDAs should discharge at the 1in1 Greenfield rate for all events up to the 1in100 event plus climate change;. sites with a surface water flow path should consider what betterment can be provided to reduce the risk of downstream flooding; and regard should be had to the Sustainable Drainage Systems Design Guide for Essex (2020) in terms of the LLFA design standards which are in line with the national CIRIA SuDS Manual.											

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02820080	Organisation	Kevin	Fraser	Essex County Council	Yes	Forward	Not Stated		Not Stated		ECC would also like to take the opportunity to re-iterate the agreed joint position with Castle Point Borough Council (CPBC) with regards to the North West Thundersley Development Option which is set out in the Statement of Common Ground (SOCG). Paragraphs 5.1 and 5.2 of the SOCG, with regards the non-allocation of the site in this Plan and the longer term strategic planning approach. "Both CPBC and ECC agree that any potential growth in North West Thundersley must be master planned in a comprehensive manner over the long-term requiring collaborative work, via the Duty to Co-operate, between CPBC, ECC, Basildon Borough Council, Rochford District Council and other South Essex Councils (SEC), given their proximity and shared infrastructure corridors, including the A127/A130 strategic network and Fairglen Interchange. There are multiple land ownerships in NWT, which would require coordinated planning and infrastructure delivery. While it is recognised that large-scale developments — including new settlements — often involve complex land assembly or government support both CPBC and ECC agree that such mechanisms are not in place or sufficiently advanced to support delivery within the current plan period. The Castle Point Plan (Regulation 19) does not rely on NWT to meet its local need for housing as set out in the Local		Not Stated		Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	ECC refers to potential development in NW Thundersley. ECC acknowledge that CP's housing need is not dependent on NW Thundersley being developed, and note it would require a co-ordinated process to bring the site forward which would include input from neighbouring councils	CPBC has not allocated any sites in NW Thundersley but notes should any site be brought forward in the future, it would include input from neighbouring councils	

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											Housing Needs Assessment (2023) or wider spatial objectives. As such, no allocation is proposed, and any future consideration of the site should be pursued through a longer-term strategic planning process." Finally, in the context of a Spatial Development Strategy (SDS), we note, the Greater Essex Mayoral role will involve setting a strategic framework for investment and development, including housing and employment growth. The SDS will provide clarity on the quantity and strategic locations for growth in the longer term looking forward 30 years to support and guide future Unitary Authority Local Plans, which could include areas where there are current constraints to overcome, including North West Thundersley.										
07080001	Individual	Diane	Fredricks		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N		

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12940001	Individual	Linda	Freeman			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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																		<p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u></p>	

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																		Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
12940002	Individual	Linda	Freeman			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
12	Individual	Linda	Freeman			C4					The number of Canvey West homes puts residents in the East						Development at West Canvey will impact	The safety of all Castle Point	N

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940003											at risk with emergency evacuation procedures.						emergency evacuation procedures for those residents living at East Canvey	residents is a priority and has been considered within the Castle Point Plan	
08320001	Individual	Graham	Frost		Yes	SP3	No	None of these guidance points appears to have been adhered to: The Castle Point Plan Draft should have been prepared in accordance with the Council's latest Local Development Scheme. The Castle Point Plan Draft should be accompanied by a Sustainability Appraisal and Habitat Regulations Assessment. Consultation on the Castle Point Plan Draft should have been carried out in accordance with the Council's Statement of Community Involvement. Castle Point Borough Council should have worked collaboratively with neighbouring authorities and prescribed bodies on strategic and cross boundary matters, known as the Duty to Cooperate. The Castle Point Plan Draft should comply with all relevant laws including the Planning and Compulsory	No	Positively prepared, Effective, Justified	Non-sustainable proposal which is imbalanced with the surrounding areas. The cart has literally been put before the horse with no infrastructure proposals to cope with the proposed demands. I'm afraid it would appear to me that our Councillors are looking somewhat amateurish and have been overwhelmed and out-manoeuvred by peers from other boroughs who are better at protecting their residents	Build a third access road towards Thurrock before anything else.	No	Not Answered	Not Answered		Infrastructure Third Road onto Canvey	Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Third Road onto Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access	N

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								Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012.										improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
097	Individual	Michael	Fulle		Yes	Whole Plan	Yes		Yes				Not Ans	Not Ans	Not Ans		Castle Point Plan is sound and legally compliant,	Support noted.	N

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3-00001													were	were	were				
0538-0001	Individual	Kathleen	Furnell		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing	N

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											is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.								land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic	

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																		<p>paper.</p> <p>Strategic alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the</p>	

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																		<p>Sustainability Appraisal (SA).</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the</p>	

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																		<p>capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Emergency Evacuation The Councils detailed</p>	

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																		<p>emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/</p> <p>Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified</p>	

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																		through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0538-0002	Individual	Kathleen	Furnell		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing	N

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																		<p>commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025).</p> <p>Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt.</p> <p>That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the</p>	

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																		Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0538-0003	Individual	Kathleen	Furnell		Yes	Foreword					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N

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0597-0001	Individual	Ronald	Furnell		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped	N

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											evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.	Strategic alternatives North west	

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																		<p>Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p>Green/Grey Belt The Council has</p>	

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																		undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the	

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																		<p>impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergen</p>	

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																		<p>cyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation</p>	

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																		Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0597-0002	Individual	Ronald	Furnell		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing	N

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																		<p>commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025).</p> <p>Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt.</p> <p>That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the</p>	

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																		Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.		
0597-0003	Individual	Ronald	Furnell		Yes	Foreword					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.						A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	Comments noted. The council has prioritised inclusivity for the consultations.	N
0293-000	Individual	Jan	Galgey		Yes	Whole Plan	Yes	Dear sir/madam I support the castle point plan regulation 19 draft consultation I consider the draft plan to be legally compliant	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N	

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01								I consider the draft plan to be sound											
02960001	Individual	Ray	Galgey		Yes	Whole Plan	Yes	I support the Castle Point Plan Regulation 19 Draft Consultation. I consider the draft plan to be legally compliant. I consider the draft plan to be sound.	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N
14150001	Individual	Myra	Galley		Yes	Whole Plan	Yes	I support the Castle Point Plan Draft I consider the Draft Plan to be legally compliant	Yes		I consider the Draft Plan to be sound.						Castle Point Plan is sound and legally compliant,	Support Noted	N
12970001	Individual	Patrick	Gardiner			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								Thundersley and it has no credible five-year housing land supply.			infrastructure , the proposed 3316 urban homes for Canvey is not resident led						West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In	

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																		<p>addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.</p>	
1297-	Individual	Patrick	Gardiner			HOU5		The plan has included Thorney Bay development for 173 homes, so what makes									Policy HOU5 should make provision for improved site	Comments noted. Policy HOU5 does not restrict	N

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0002								the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									environment for the local residents	improvement to the sites environment	
1297-0003	Individual	Patrick	Gardner			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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0523-0001	Individual	Sandra	Gardner		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park H031. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped	N

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											evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.	Strategic alternatives North west	

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																		<p>Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p>Green/Grey Belt The Council has</p>	

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																		undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the	

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																		<p>impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergen</p>	

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																		<p>cyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation</p>	

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																		Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0523-0002	Individual	Sandra	Gardner		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing	N

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																		<p>commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025).</p> <p>Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt.</p> <p>That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the</p>	

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																		Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0523-0003	Individual	Sandra	Gardner		Yes	Foreword					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N

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000001	Individual	Neal	Garnier		Yes	SP3	No	<p>"The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for</p>	No	Not Stated	<p>To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been</p>	<p>I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.</p>	Not Stated		No	A	<p>Welcomes the decision not to allocate Green Belt land. But suggests NW Thundersley should have been considered. Argues the Plan fails to demonstrate a deliverable five-year supply. Strongly objects to over-allocation on Canvey Island due to flood risk, drainage limitations, and lack of a third access road. Criticises the exclusion of North West Thundersley (Blinking Owl site), which he sees as a more sustainable and infrastructure-led alternative. Also questions the sites SA assessment. Concerned over evidence of Duty to Cooperate.</p>	<p>The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground</p> <ul style="list-style-type: none"> • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) 	N

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								residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in			robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the									outlines why North West Thundersley was not preferred.). <ul style="list-style-type: none"> • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. 	

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								planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its			balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the										

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								environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the			same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related										

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								Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. While the draft Plan identifies a range of mitigation measures, it does not yet provide enforceable delivery mechanisms. Without clear implementation pathways, these measures risk remaining theoretical rather than practical. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the			to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential.											

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								Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest. Soundness of the Plan T Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This												

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								aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood												

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								attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the											

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								Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably											

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								<p>more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF</p>												

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								(2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and												

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								<p>strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies</p>												

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								<p>within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness</p>												

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								<p>under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed.</p> <p>Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the</p>												

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								<p>brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right</p>												

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								adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. “											
00010002	Individual	Neal	Garnier		Yes	Forward	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its	No	Not Stated			Not Stated		No	A	• Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								expectation that Statements of Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0198001	Individual	Donna	Garnier		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The	PROPOSED MODIFICATION : Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDs design Guide for Essex. Canvey	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex

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											3,316+ urban homes for Canvey is not resident led.						The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	SuDS options have been considered through the SFRA.	County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
01980002	Individual	Donna	Garnier		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
03490001	Organisation	Stephen	Garnier	Castle Point		TC5		The Planning Service has observed a notable increase in complaints relating to Disturbance during unsociable hours, which is common with takeaway operations and short-term holiday lets. These impacts are inconsistent with the character and purpose of residential neighbourhoods, which are intended to provide a peaceful and secure environment for residents. Uses of this nature are more appropriately located in designated commercial areas such as town centres,							A	Policy TC5. Objects to hot food takeaways in residential zones.	Part 1 of the policy states 'New hot food takeaways or fast food outlets will <i>only</i> be permitted in town centres, local shopping parades or in out of centre retail parks' subject to further conditions. The inclusion of the word 'only' is considered to cover the concern, since it is implicit in the wording that hot fod takeawasy should'nt be	N	

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								shopping parades, or industrial estates, where infrastructure and planning controls are better suited to manage their effects. Permitting such uses within residential areas risks setting a precedent that could erode the integrity of these communities, leading to cumulative harm and a decline in quality of life for long-term residents. It is therefore recommended that the Castle Point Plan is clear within its policies that it resists the encroachment of commercial activities into residential zones, except where they are demonstrably ancillary, low-impact, and appropriately regulated.										located in residential areas, but only in town centres, local shopping parades.	
0660001	Individual	Neal	Garner		Yes	Whole Plan	No	Not everything has been taken into account Canvey island roads, drainage system, flood prevention (it's a flood plain) sewage treatment plant is too small, schooling, doctors surgeries	No		It's none of the above	Include infrastructure on Canvey, schools, doctors, sewage systems & treatment, flooding prevention, drainage none of this has been covered	No	Not Answered	Not Answered		More infrastructure on Canvey Flood Risk on Canvey	Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flood Risk Whilst Canvey is at risk of	N

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																		flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	

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09560001	Individual	Lucy	Garwood		Yes	HAD4	Yes		No	Positively prepared, Effective	The plan to put 114 new homes on this site south of Scrub lane, would be unnecessary over-development of the area. With little to no thought about the impact the extra traffic and vehicle parking would place on the already strained road network in the area.	There would be less objection to a significantly lower volume of housing in that area 10-20 new homes, that would not result in the lose of an outdoor space used by the locals. This lower volume of housing would also not cause a severe strain on the local roads.	No	Not Answered	Not Answered		Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Parking Capacity Any application for homes on this site will have to comply with policy T7 which requires the EPOA Parking Guidance (Part 1 and 2) to be implemented. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.	N

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12670001	Individual	Gwenda	Gatrell			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.				Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)	

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																		<p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u></p>	

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																		Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
12670002	Individual	Gwenda	Gatrell			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1260003	Individual	Gwenda	Gatrell			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0046001	Individual	Ian	George		Yes	Whole Plan	Yes	Dear Sir/Madam I support the castle point plan regulation 19 draft consultation I consider the draft plan to be legally compliant I consider the draft plan to be sound	Yes				Not Stated		No		Castle Point Plan is sound and legally compliant,	Support Noted	N

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0604-0001	Individual	Linda	Gibbs		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped	N

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											evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.	Strategic alternatives North west	

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																		<p>Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p>Green/Grey Belt The Council has</p>	

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																		undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the	

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																		<p>impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergen</p>	

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																		<p>cyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation</p>	

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																		Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0604-0002	Individual	Linda	Gibbs		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing	N

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																		<p>commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025).</p> <p>Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt.</p> <p>That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the</p>	

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																		Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0604-0003	Individual	Linda	Gibbs		Yes	Foreword					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N

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14230001	Individual	Roger	Gibbs			Page 31, Section 7 - Place Based Approach. (Ref Thundersley)	Not Stated	First, my thanks to you all at the Planning Department on what appears a very well presented and thoughtful plan. Overall my only comment would be that we must try hard to keep down the number of new houses that must be squashed in. Our borough has a tiny area compromised by an excessively large proportion of historically designated green belt. I can see you equally recognise the problem. I will only focus my views on the Thundersley area [REDACTED Personal Information]	Not Stated		The diagram illustrates a problem where the area of Thundersley is "C" shaped. The wider Chase developments (and many new developments off Kiln Road etc) have no proper footpath connection to Thundersley village. The route along the un-made middle of The Chase is narrow, generally muddy, and made unsafe with frequent vehicles splashing past walkers. At night it is a no-go route. Please make it a priority to provide a well lit, hard path for pedestrians going from the eastern part of The Chase developments towards Thundersley village. It would probably make a good contribution to reducing short car usage between these points for children going to / from school, visits to doctors, chemist, etc. The point above also highlights the lack of any bus routes serving this area. Wensley Road is another muddy track making it unsuitable for easy walking to the Kiln Road bus routes. We had expected a footpath from The Swale into the recent Kiln Road housing. (Presumably the developers didn't want to loose a few feet of housing opportunity?) No bus routes now serve Rayleigh Road. Delighted to see a commitment to preventing Coalescence between Thundersley / Benfleet / Hadleigh / Daws Heath. I hope this will be enshrined in true protection. There are still a few remaining areas of woodland and fields along The Chase, Wensley Road, Swale Road, Warren						Generally supportive of a very well presented and thoughtful plan. The diagram illustrates a problem where the area of Thundersley is "C" shaped. The wider Chase developments (and many new developments off Kiln Road etc) have no proper footpath connection to Thundersley village. The route along the un-made middle of The Chase is narrow, generally muddy, and made unsafe with frequent vehicles splashing past walkers. At night it is a no-go route. Please make it a priority to provide a well lit, hard path for pedestrians going from the eastern part of The Chase developments towards Thundersley village. It would probably make a good contribution to reducing short car usage between these points for children going to / from school, visits to doctors, chemist, etc. The point above also highlights the lack of any bus routes serving this area. Wensley Road is another muddy track making it unsuitable for easy walking to the Kiln	Noted. Highways and Public Rights of Way are both County matters and managed by Essex County Council https://www.essexhighways.org/roads-and-pavements/public-right-of-way-maintain The Plan has endeavoured to produce policies that protect and enhance the Borough's valued biodiversity and green infrastructure.	N

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											Chase, that have somehow survived the developers. Can we please get some firm legal protection on the these vital green plots. When we came to the area in [REDACTED Personal Information] it was common the see hundreds of varieties of birds, and animal species. Now is mostly seagulls, magpies, and rats. A lot more is still about, although harder to find. They are just clinging to survival in a few areas. Please don't just leave your commitments to nature and wildlife corridors as empty words on paper.						Road bus routes. We had expected a footpath from The Swale into the recent Kiln Road housing. (Presumably the developers didn't want to loose a few feet of housing opportunity ?) No bus routes now serve Rayleigh Road. Delighted to see a commitment to preventing Coalescence between Thundersley / Benfleet / Hadleigh / Daws Heath. I hope this will be enshrined in true protection. There are still a few remaining areas of woodland and fields along The Chase, Wensley Road, Swale Road, Warren Chase, that have somehow survived the developers. Can we please get some firm legal protection on the these vital green plots. When we came to the area in 1985 it was common the see hundreds of varieties of birds, and animal species. Now is mostly seagulls, magpies, and rats. A lot more is still about, although harder to find. They are just clinging to survival in a few areas. Please don't just leave your commitments to nature and wildlife		

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																	corridors as empty words on paper.		
0611-0001	Individual	Linda	Gibson		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the	N

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											we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.								Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that	

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																		<p>point onwards. For further information please see housing topic paper.</p> <p>Strategic alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Consideration of All Sites All reasonable option sites were</p>	

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																		<p>considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence</p>	

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																		<p>of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p>	

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																		<p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/</p> <p>Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need</p>	

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																		for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0611-0002	Individual	Linda	Gibson		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They	N

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											overall site environment for the local residents.							are however included within the existing commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025). Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it	

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																		has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.		
0611-0003	Individual	Linda	Gibson		Yes	Fore word					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.						A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N
0718-	Individual	Warren	Gibson		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N	

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00001																			
0800001	Individual	Tom	Gibson		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
07560001	Individual	James	Giddins		Yes	SP3	No	Failed to consider strategic alternatives like north west thundersley No credible 5 year housing land supply	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage	Draft document 'legally compliant' and/or 'sound', including any revised wording. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No	Not Answered	Not Answered		Lack of Five Year Housing Land Supply Green/Grey Belt not considered North West Thundersley Flood Risk on Canvey Emergency Evacuation Concerns	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is	N

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											<p>infrastructure. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures</p>							<p>therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply</p>	

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																		<p>position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the</p>	

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																		<p>value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within</p>	

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																		<p>the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Flooding on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the</p>	

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																		location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/	
1391001	Individual	Eileen	Gilbert		Yes	Whole Plan	Yes	I support the Castle Point Plan Draft I consider the Draft Plan to be legally compliant	Yes		I consider the Draft Plan to be sound.						Castle Point Plan is sound and legally compliant,	Support Noted	N

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0893-0001	Individual	Lee	Glascock		Yes	HAD4	Yes		No	Positively prepared, Effective, Justified	<p>Dear Sir/Madam,</p> <p>I am writing to register my strong objection to the proposed development of 114 new homes on Scrub Lane, adjacent to the local primary school. While I understand the need for housing, this particular proposal will create significant and lasting problems for both residents and the wider community.</p> <p>Traffic & Safety Concerns Scrub Lane is already used heavily as a cut-through from the A13 to Southend. At peak hours, traffic volumes are severe, and access to and from private driveways is extremely difficult. In my own experience, it is not uncommon for 10–20 cars to pass before there is an opportunity to exit the driveway safely. When there are delays or roadworks on the A13, congestion worsens to the point where traffic is bumper-to-bumper.</p> <p>Introducing 114 additional homes, many of which will have multiple car-owning households, will inevitably create gridlock. By conservative estimates, this could mean several hundred additional vehicles trying to access Scrub Lane daily, intensifying congestion, increasing air pollution, and raising the risk of accidents.</p> <p>The proposed access point via Scrub Lane is entirely unsuitable for such a volume of traffic. The volume already means that even</p>		No	Not Answered	Not Answered	A	Objecting to HAD4 because: Traffic Parking Infrastructure Density	<p>Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation.</p> <p>Parking Capacity Any application for homes on this site will have to comply with policy T7 which requires the EPOA Parking Guidance (Part 1 and 2) to be implemented.</p> <p>Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).</p> <p>Density</p>	N

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											<p>a few parked cars currently cause severe obstructions and tailbacks. Scaling this up to account for hundreds of extra vehicles is simply unmanageable.</p> <p>Proximity to Primary School Locating new housing, including units for residents with complex needs, immediately beside a primary school raises serious safeguarding questions. While the definition of "complex needs" is broad, the placement of such accommodation next to a site where young children gather every day is not a wise or safe choice. At the very least, this requires much greater scrutiny before approval could even be considered.</p> <p>Pressure on Local Infrastructure Local services are already under immense strain. The primary school, which is small, will struggle to cope with the inevitable increase in pupil numbers, leading to overcrowded classrooms and reduced educational quality.</p> <p>The local GP surgery, situated at the end of Scrub Lane, is already oversubscribed. Personally, I have had to go without appointments despite living with chronic health conditions, simply because i cannot get through on the phone or get an actual appointment when i need it. Adding hundreds of new residents will make it virtually impossible for current patients to receive timely care. This is not</p>															

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											<p>only a local inconvenience but a serious public health issue.</p> <p>Local shopping facilities (Morrisons, Lidl, and others) are already stretched. Parking is difficult in peak times, and with several hundred new residents across Benfleet, Thundersley proposals and now this, demand will far exceed supply. This overdevelopment risks eroding the quality of life for everyone in the area.</p> <p>The road of scrub lane and surrounding area has always been considered as a peaceful and attractive area, with woodland and walks that bring in many visitors. It seems all that's happening is we are constantly cramming housing into the area (scrub lane mews and now this). When will it stop? When the natural beauty of the area is gone?</p> <p>Cumulative Impact It is vital to consider this proposal in the wider context of ongoing development in Castle Point. The cumulative effect of large-scale building projects is leaving residents feeling cramped in, with infrastructure lagging far behind housing expansion. Roads, schools, healthcare, and local services are already inadequate. Adding this development will simply worsen every existing problem.</p> <p>Conclusion This application is wholly inappropriate for Scrub Lane. The</p>														

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											severe traffic problems, risks to child safety, overstretched healthcare and education services, and the cumulative overdevelopment of Castle Point make this proposal unsustainable. I urge the Council to reject this application and instead seek alternative, more suitable sites that do not jeopardise the wellbeing of existing residents and the safety of our children.									

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0489-0001	Individual	Robert	Glenister		Yes	Had2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do not totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, puts the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No		Adoption, Future revisions	A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes	N

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											links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan	

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																		and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11	

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																		<p>onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport</p>	

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																		<p>evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle</p>	

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																		<p>Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out</p>	

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																		above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	
13200001	Individual	M	Glover			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1320002	Individual	M	Glover			SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			No five year housing land supply North West Thundersley should have been included Approach to Green/Grey Belt NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).	

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																		<p>common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West</p>	

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																		<p>Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by</p>	

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																		strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local	

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																		<p>highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to Canvey. SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS</p>	

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																		design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1320003	Individual	M	Glover			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1321001	Individual	J	Glover			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1320002	Individual	J	Glover			SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			No five year housing land supply North West Thundersley should have been included Approach to Green/Grey Belt NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).	

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																		<p>common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West</p>	

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																		<p>Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by</p>	

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																		strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local	

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																		<p>highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to Canvey. SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS</p>	

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																		design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1321-0003	Individual	J	Glover			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/P ara No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a . So und?	3b. Positive/Effect ive/Justified/C onsistent?	3c. Explanation	4. Suggested modifications	5. Wis h to part icip ate in exa m	6. Why ?	Sup port ing Evid enc e sup plied?	Opti on A, B or C	Summary	Officer Response	Mods Required
0536-0001	Individual	Ann	Godfrey		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped	N

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											evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.	Strategic alternatives North west	

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																		<p>Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p>Green/Grey Belt The Council has</p>	

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																		undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the	

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																		<p>impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergen</p>	

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																		<p>cyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation</p>	

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																		Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0536-0002	Individual	Ann	Godfrey		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing	N

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																		<p>commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025).</p> <p>Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt.</p> <p>That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the</p>	

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																		Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0536-0003	Individual	Ann	Godfrey		Yes	Fore word					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N
1363-000	Individual	Linda	Godley			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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01											development which improves the overall site environment for the local residents.								
1363-0002	Individual	Linda	Godley			SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			No five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).	

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																		land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic	

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																		<p>paper.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments</p>	

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																		guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of	

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																		<p>additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to Canvey. SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site</p>	

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																		circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1363-0003	Individual	Linda	Godley			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0340001	Individual	Linda	Godman		Not Stated	Had 4	Not Stated	I strongly object to the proposed development to build 114 homes on the field in Scrub lane. The road is already regularly congested and the planned buildings will not be in keeping with the other houses. Also the	Not Stated				Not Stated		No		I strongly object to the proposed development to build 114 homes on the field in Scrub lane. The road is already regularly congested and the planned buildings will not be in keeping with the other houses. Also the	Concerns noted. Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). The plan has	N

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								doctors surgery is at full capacity									doctors surgery is at full capacity	been subject to detailed Transport Assessment, assessing impacts and recommending interventions.	
0283001	Organisation	Emma	Goodings	Rochford District Council	Not Stated	SP3	No	Rochford District Council (RDC) does not consider the Castle Point Local Plan (CPLP) to be legally compliant due to its failure to meet its standard methodology housing need requirement as outlined in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG). Paragraph 62 of the NPPF states that “to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance.” For Castle Point, the standard method identifies a requirement for the delivery of 11,662 new dwellings over the proposed Local Plan period (2026 to 2043). However, Policy SP3 includes a housing strategy that delivers a	No	Positively Prepared, Justified, Consistent with National Policy	Positively Prepared: RDC does not consider the CPLP to be positively prepared, as required by paragraph 36(a) of the NPPF. The CPLP fails to set out a clear and deliverable housing strategy for meeting the Borough’s standard method housing need requirement in full. The plan does not demonstrate that all reasonable alternatives have been considered, including those that would meet the full housing need. The evidence-base provides limited justification for the dismissal of spatial strategy options that might have enabled the Borough to meet its full housing need. Furthermore, the CPLP does not provide an agreed approach with neighbouring authorities under the Duty to Cooperate through which the Borough’s unmet housing need could be addressed. RDC reiterates that it is not able to take on any unmet housing need from Castle Point, and no evidence has been presented to suggest that such redistribution has been agreed or is deliverable. Justified: RDC does not consider the CPLP to be justified as required by paragraph 36(b) of the NPPF. The plan lacks a full and transparent assessment of alternative spatial strategy options, including those	RDC does not consider the CPLP to be legally compliant and/or sound primarily due to the failure of the CPLP to set out a clear and deliverable housing strategy that meets the Borough’s housing need in full, as calculated using the standard method in line with paragraph 62 of the NPPF. Whilst RDC acknowledges that Castle Point faces notable physical and environmental constraints, the technical evidence-base provides limited justification for the dismissal of alternative	Not Stated		No	A	Considers that the local plan is not compliant or sound as the housing strategy does not meet all of the housing need calculated by the standard methodology but recognises that CP has significant environmental and physical constraints to meeting its housing need. RDC raised concerns about CP housing strategy approach in previous responses. Does not support policy as does not meet the identified standard method housing need requirement in full. Limited justification to support shortfall and dismissal of alternative spatial options. Asserts that no agreement exists with neighbouring authorities to assist with un-met housing need. No concerns over sites allocated some comments raised for Thun2	CPBC has considered what housing delivery can be realistically achieved within its boundaries taking into account its significant environmental and infrastructure restraints as well as its market capacity. This has been rigorously evidenced through the Green Belt Assessment July 2025 which reviewed all potential sites within Castle Point’s Green Belt, these sites were then considered against further criteria including: environmental and heritage designations, flood risk,	N

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								<p>minimum of 6,196 new dwellings over the local plan period, resulting in a significant shortfall. In previous consultation responses, RDC raised concerns over strategy options that would not meet Castle Point's housing need requirement in full and strongly advised CPBC to pursue a strategy that would meet the standard methodology requirements. RDC acknowledges that Castle Point faces notable physical and environmental constraints, including a substantial proportion of land designated as Green Belt (55.9%) and a significant proportion falling within Flood Risk Zone 3 (~50%). However, RDC's objection is not solely based on the failure to meet housing need, but also on the lack of robust and transparent evidence to justify this shortfall. The CPLP evidence-base offers limited technical justification for the dismissal of alternative spatial strategy options and previously considered Green Belt development sites that might have enabled the Borough to meet its</p>			<p>that would meet the full housing need, and does not provide sufficient evidence to justify the chosen approach. Additionally, the CPLP does not demonstrate how unmet housing need would be addressed through cooperation with neighbouring authorities, and RDC confirms that it cannot accommodate any such unmet need. Consistent with National Policy: RDC does not consider the CPLP to be consistent with national policy, as required by paragraph 36(d) of the NPPF. The CPLP fails to set out a clear and deliverable housing strategy for meeting the Borough's standard method housing need requirement in full. The absence of a justified strategy for addressing unmet need through cooperation further undermines consistency with national policy.</p>	<p>spatial strategy options that might have enabled the Borough to meet its housing need in full. There is insufficient evidence that all reasonable alternatives—including those that would meet the full housing need—have been robustly assessed and justified. To ensure the CPLP is legally compliant and sound, further evaluation and testing through the technical evidence-base should be undertaken to ensure that the housing strategy is both justifiable and deliverable. For example, the transport assessment should be used to assess the cumulative impact of growth at the standard method housing need</p>				<p>Rochford states it cannot meet any of CP unmet housing need.</p> <p>States that CP has not provided an agreed approach via the DtC with neighbouring authorities on how its unmet housing need could be addressed</p> <p>RDC considers there is a lack of technical justification and robust evidence to support the shortfall in housing delivery particularly with regards the assessment of reasonable alternatives of sites located within the Green Belt.</p> <p>Suggests technical evidence could include further transport assessment on the cumulative impact of growth across South Essex</p>	<p>highways issues which impact viability, sustainability as well as having regard for the Essex LNRS and strategic opportunity areas for biodiversity improvements.</p> <p>Castle Point's approach to the site review is outlined within The Housing Capacity Topic Paper August 2023.</p> <p>Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period.</p> <p>CPBC realises that this is considerably less housing</p>		

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								<p>housing need in full. There is no clear demonstration that all reasonable alternatives, including those that would meet the full housing need, have been adequately assessed and tested. Furthermore, RDC wishes to make clear that it is not in a position to accommodate any unmet housing need arising from Castle Point. As such, the CPLP is deemed not to be legally compliant. Approach to Housing Policy SP3: As outlined above, RDC is not supportive of the CPLP housing strategy, as it does not commit to meeting the Borough's identified standard method housing need requirement in full within the CPBC administrative boundary. Limited information is provided regarding the justification for the dismissal of alternative spatial strategy options that might have enabled CPBC to meet its full housing need. Furthermore, no approach is outlined for addressing the resulting unmet need, and no agreement exists with</p>				<p>requirement on the local and strategic transport network. This would allow for a more informed understanding of infrastructure requirements and can be used to justify the scale and distribution of growth considered sustainable, acceptable and deliverable for the Borough. In addition, the CPLP must clearly demonstrate how the Borough intends to meet its housing need in full, or provide robust evidence of agreed arrangements with neighbouring authorities. RDC confirms that it is not able to accommodate any unmet housing need from Castle Point, and no</p>						<p>than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery.</p> <p>CPBC notes that BBC is unable to assist CPBC in meeting its unmet housing need.</p> <p>CPBC has followed the EPOA protocol for considering unmet housing need and has requested assistance from all its neighbouring authorities to help with meeting its unmet housing need. No authority was able to assist. CPBC has considered what housing delivery can be realistically achieved within its boundaries taking into account its significant environmental and</p>	

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								neighbouring authorities to accommodate it. RDC therefore finds Policy SP3 to be neither legally compliant nor sound.				such agreement currently exists.						infrastructure restraints as well as its market capacity. This has been rigorously evidenced through the Green Belt Assessment July 2025 which reviewed all potential sites within Castle Point's Green Belt, these sites were then considered against further criteria including: environmental and heritage designations, flood risk, highways issues which impact viability, sustainability as well as having regard for the Essex LNRS and strategic opportunity areas for biodiversity improvements. Castle Point's approach to the site review is outlined in The Housing Capacity Topic Paper August	

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																		<p>2025.</p> <p>Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period.</p> <p>CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery.</p> <p>CPBC notes that RDC is unable to assist CPBC in meeting its unmet housing need.</p> <p>CPBC has followed the EPOA protocol for considering</p>	

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																		unmet housing need and has requested assistance from all its neighbouring authorities. No authority was able to assist.	
0283-0002	Organisation	Emma	Goodings	Rochford District Council	Not Stated	Forward	Yes	Rochford District Council (RDC) has no specific concerns to raise over Castle Point Borough Council's (CPBC) legal compliance with respect to the Duty to Co-operate. RDC notes that while officer-level engagement has taken place through South Essex Councils (SEC) and Essex Planning Officers Association	Yes			In line with Paragraph 28 of the NPPF, RDC requests the agreement of a Statement of Common Ground with CPBC to evidence areas of agreement in support of the submission of the Plan for examination.	Not Stated		No	A	States that there are no Duty to Cooperate concerns with CP. Good working relationship at officer level but queries member DtC with reference to the local plan. Requests a Statement of Common Ground to be put in place.	All South Essex members including CPBC members meet their Duty to Cooperate through SEC and EPOA and will continue to collaborate on strategic matters through these bodies. CPBC to draw up	N

I D R e f	Individual/ Organisatio n/Agent?	Firs t Na me	Last Nam e	If orga nisat ion - nam e	Has agreed to public ation of Name/ Comm ents?	Poli cy/P ara No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a . So und?	3b. Positive/Effect ive/Justified/C onsistent?	3c. Explanation	4. Suggested modifications	5. Wis h to part icip ate in exa m	6. Why ?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
								(EPOA), there has been limited member-level involvement regarding Castle Point's Local Plan. RDC encourages greater member engagement through SEC to support strategic alignment and transparency. The Council would, however, like to emphasise the importance of ongoing and meaningful collaboration between local authorities in addressing all identified strategic priorities, particularly in relation to infrastructure. CPBC is therefore encouraged to continue to positively and constructively engage with RDC on strategic cross-boundary matters, especially as the emerging Rochford Local Plan progresses.				RDC also wishes to make clear that it is not in a position to accommodate any unmet housing need arising from Castle Point, and no agreement currently exists to do so.						a Statement of Common Ground	
0 2 8 3- 0 0 0 3	Organisatio n	Em ma	Go od ing s	Roch ford Distri ct Coun cil	Not Stated	Thun 2	Yes	RDC does not, however, have specific concerns to raise over the soundness of the sites proposed for allocation in this strategy, other than the detailed comments separately provided for Policy Thun2. Policy Thun2: RDC notes that the land proposed for allocation at Kiln Road comprises a significant re-	Ye s				Not Stat ed		No	A	No concerns over soundness of policy. Raises issue of impact on infrastructure and loss of school and recreational facilities for policy THUN 2 and recommends this site is carefully master planned and for RDC to be involved in these discussions.	Noted and CP will collaborate with RDC on the masterplan for Thun2	N

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								development of a brownfield site which is currently home to USP College. RDC has no specific concerns over the soundness of this policy but would like to emphasise the importance of ensuring that the delivery of this site does not place an undue burden on cross-boundary infrastructure and is adequately supported by local infrastructure improvement. It is recommended that officers ensure master plan proposals for Kiln Road prioritise the preservation of the USP college and its educational and recreational offerings after or during the development of the new campus. RDC would welcome opportunities for further discussions on to ensure the site is able to come forward in a way that is environmentally, economically and socially sustainable.													
0283004	Organisation	Emma	Goodings	Rochford District Council	Not Stated	Hou6	Yes	Policy Hou6: The Council supports CPBC's approach to meeting identified needs for additional Gypsy and Traveller accommodation. RDC would like to	Yes				Not Stated		No	A	Supports CP's policies on Gypsy and Traveler Sites. Refers to need to work across South Essex to identify a transit site.	Noted agreed	N		

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								emphasise the need for continued close and effective working on Gypsy and Traveller accommodation across Essex, through the EPOA and other strategic planning groups. Furthermore, it is important for CPBC to continue to engage with the ongoing EPOA programme of work to identify the need for a transit site within Essex, with any outcomes of this work factored into reviews of the CPLP.											
0283-005	Organisation	Emma	Goodings	Rochford District Council	Not Stated	E1	Yes	Policy E1 and E2: RDC is broadly supportive of these policies and the CPLP's overall economic strategy. It is acknowledged that the provision of new employment land in and around town centres, and the safeguarding of economy use at existing sites (including at SEL2: Stadium Way, Rayleigh Weir) may provide opportunities to broaden and diversity the local economy and provide employment opportunities for residents of a wider area, including Rochford District, both directly and indirectly through supplementing wider supply chains.	Yes				Not Stated		No	A	Supports CP plan's economic policies Policy	Noted	N

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								Approach to Town Centre and Retail											
02830006	Organisation	Emma	Goodings	Rochford District Council	Not Stated	E2	Yes	Policy E1 and E2: RDC is broadly supportive of these policies and the CPLP's overall economic strategy. It is acknowledged that the provision of new employment land in and around town centres, and the safeguarding of economy use at existing sites (including at SEL2: Stadium Way, Rayleigh Weir) may provide opportunities to broaden and diversify the local economy and provide employment opportunities for residents of a wider area, including Rochford District, both directly and indirectly through supplementing wider supply chains.	Yes				Not Stated		No	A	Supports CP's economic policies Notes safeguarding sites such as SEL2: Stadium Way, Rayleigh Weir and new provision offers employment opportunities to wider area including Rochford.	Noted Noted	N
02830007	Organisation	Emma	Goodings	Rochford District Council	Not Stated	TC1	Yes	Policies TC1 to TC5: RDC has no specific concerns over the soundness of these policies.	Yes				Not Stated		No	A	Supports Policy on Town Centres and Retail Areas Supports Policy on Hot Food Takeaways	Noted	N
02830000	Organisation	Emma	Goodings	Rochford District Council	Not Stated	ENV1	Yes	Approach to Environment, Biodiversity and Landscape Policy ENV1: RDC has no specific concerns over the soundness of					Not Stated		No	A	Supports Policy. Raises query re inclusion of Kingley Wood (an area of ancient woodland within the Rochford District administrative	Noted mapping anomaly amended	N

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08								this policy, or the wider environmental strategy. RDC however requests for further clarification regarding the inclusion of Kingley Wood (an area of ancient woodland within the Rochford District administrative boundary) in CPLP interactive mapping.									boundary) in CPLP interactive mapping.		
0283-0009	Organisation	Emma	Goodings	Rochford District Council	Not Stated	SP4	Yes	Approach to Social Infrastructure and Community Facilities Policy SP4: RDC has no specific concerns over the soundness of this policy, or the wider infrastructure delivery strategy. RDC would, however, like to emphasise the importance of ensuring that the impacts of growth on key cross-boundary infrastructure including, schools, open spaces and healthcare services. This will require continued commitments to collaborative working, including through positive engagement between the Councils as a part of SEC and the EPOA.	Yes				Not Stated	No	A	Supports Policy. Refers to importance to collaborate to accommodate cross-boundary growth on shared infrastructure including schools, open space and healthcare	CPBC concurs that continued collaborative positive engagement between Councils as part of SEC and EPOA is important to successful plan-making of infrastructure to support growth.	N	
0283-000	Organisation	Emma	Goodings	Rochford District Council	Not Stated	T1/T2	Yes	Approach to Highways, Transport and Infrastructure Policy TP1 and TP2: RDC is broadly supportive of these	Yes				Not Stated	No	A	Supports Policy. Highlights need for continued cross-boundary collaboration to consider the cumulative growth	CPBC will continue to work in collaboration with all Essex authorities to consider the	N	

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10								policies and the wider transport strategy proposed. RDC however, would like to highlight the need to keep under consideration the impacts of growth on shared infrastructure, such as on the A127 (including at the Fairglen Interchange), A130, A129 and A13. It is critical that the impacts of growth on the highway network are carefully considered and mitigated. In particular, RDC considers the adequate mitigation of the impacts of growth on the A127 and A129 to be paramount to achieving sustainable development in South Essex. The Council would welcome continued future cross-boundary engagement regarding shared highways and transportation matters and request that information regarding proposed infrastructure improvement plans are shared with officers prior to works being agreed.									impacts on A127 (including at the Fairglen Interchange), A130, A129 and A13 and that adequate mitigation in place. Supports Policy. Highlights need for continued cross-boundary collaboration to consider the cumulative growth impacts on A127 (including at the Fairglen Interchange), A130, A129 and A13 and that adequate mitigation in place.	cumulative growth impacts on the transport network in South Essex. CPBC will continue to work collaboratively with all Essex authorities to consider the cumulative growth impacts on the transport network in South Essex.	
0283-0	Organisation	Emma	Goodings	Rochford District	Not Stated	T3 / T4	Yes	Policy TP3 and RP4: RDC is broadly supportive of these policies and the wider commitment to	Yes				Not Stated		No	A	Supports Policy. emphasises importance of ensuring the impacts of growth on sustainable	The Castle Point Local Walking and Cycling Infrastructure Plan 2025 has	N

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0111				Council				enhance active travel and public transport infrastructure. RDC would, however, like to emphasise the importance of ensuring the impacts of growth on sustainable transport networks are carefully considered and mitigated. RDC advocates for the delivery of cycling and walking routes which strengthen connectivity between Rochford, Castle Point and Southend.									transport networks are carefully considered and mitigated. Advocates for the delivery of cycling and walking routes between Rochford, Castle Point and Southend. Supports Policy. emphasises importance of ensuring the impacts of growth on sustainable transport networks are carefully considered and mitigated. Advocates for the delivery of cycling and walking routes between Rochford, Castle Point and Southend.	identified cycling routes between Castle Point Rochford and Southend. CPBC welcomes collaboration with RDC and SCC to bring these routes forward. CPBC agrees to collaborate with RDC and the other South Essex Authorities to ensure that necessary public transport improvements are in place to support growth.	
02840001	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	Forward	Yes	BBC has no specific concerns to raise over CPBC's legal compliance with respect to the Duty to Co-operate. BBC is satisfied with the significant amount of cross-boundary engagement that CPBC has undertaken, including as part of the Association of South Essex Local Authorities (ASELA) and Essex Planning Officers Association (EPOA). The Council would, however, like to emphasise the importance of ongoing and meaningful collaboration between	Not Stated				Not Stated		No	A	No concerns to raise over CPBC's legal compliance with respect to the Duty to Co-operate. States that continued collaboration is important Brentwood is unable to assist with CPBC's unmet housing need Requests a Statement of Common Ground to evidence areas of agreement.	CPBC will still collaborate with BBC through SEC and EPOA to address cross boundary strategic issues. Noted that BBC is unable to assist CPBC in meeting its unmet housing need. CPBC will prepare a statement of common ground.	N

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								the local authorities in helping to address aspects across all identified strategic priorities, particularly in the context of infrastructure. As such, CPBC are encouraged to continue to positively and constructively engage with BBC on strategic cross-boundary issues, particularly as the Brentwood Local Plan Review progresses. Considering Paragraph 28 of the NPPF, BBC requests the agreement of a Statement of Common Ground with CPBC to evidence areas of agreement in support of the submission of the Plan for examination. BBC also wishes to make clear that it is not in a position to accommodate any unmet housing need arising from Castle Point, and no agreement currently exists to do so.													

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02840002	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	SP3	No	Policy SP3: As above, BBC is not supportive of the CPLP housing strategy as this does not commit to meeting the Borough's identified standard method housing need requirement in full within the CPBC administrative boundary. Limited information is provided regarding the justification for the dismissal of alternative spatial strategy options that might have enabled CPBC to meet its full housing need and, no approach is outlined for addressing the unmet need. As such, BBC finds Policy SP3 to not be legally compliant or sound. BBC however has no specific concerns to raise over the soundness of the sites proposed for allocation in this strategy.	No				Not Stated		No	A	<p>Considers the local plan is not legally compliant or sound as housing strategy does not meet all of the housing need calculated by the standard methodology Acknowledges CP's physical and environmental constraints. Considers that there is limited technical evidence to justify lower housing delivery and no full transparent assessment of alternative spatial strategies including one that would meet the full standard methodology housing need.</p> <p>Suggest that further evidence and testing required – propose the cumulative impact on transport</p>	<p>CPBC has considered what housing delivery can be realistically achieved within its boundaries taking into account its significant environmental and infrastructure restraints as well as its market capacity.</p> <p>This has been rigorously evidenced through the Green Belt Assessment July 2025 which reviewed all potential sites within Castle Point's Green Belt, these sites were then considered against further criteria including: environmental and heritage designations, flood risk, highways issues which impact viability, sustainability as well as having regard for the Essex LNRS and strategic</p>	N

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																		<p>opportunity areas for biodiversity improvements.</p> <p>Castle Point's approach to the site review is outlined within The Housing Capacity Topic Paper August 2025. Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period.</p> <p>CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery.</p>	

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																		<p>CPBC notes that Brentwood is unlikely to be able to assist CPBC in meeting its unmet housing need.</p> <p>CPBC has followed the EPOA protocol for considering unmet housing need and has requested assistance from all its neighbouring authorities. No authority was able to assist.</p> <p>CPBC transport assessment provided high level modelling of the impact of growth on key highway junctions. Further transport assessments will be carried out as housing allocations come forward during the local plan period.</p> <p>BBC and the other South Essex Local Authorities are currently preparing their</p>	

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																		<p>local plans and developing their housing strategies to accommodate the expected significant growth across South Essex. As these local plans come forward, their transport assessments will add to the evidence and provide greater granular detail of the impact of this cumulative growth on the transport network.</p> <p>CPBC welcomes collaboration with neighbouring authorities on their transport assessments as they finalise their housing strategies following the revised December NPPF 2024. CPBC also proactively engages with ECC LTP4 work which provides evidence for transport infrastructure for all of Essex</p>	

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02840003	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	D3	Yes	BBC supports CPBC's approach to require the use of Master Plans for allocated sites as these can be a valuable tool to ensure development proposals. achieve the intentions of the relevant policies in the Local Plan. Additionally, the Council supports the inclusion of the requirement for Master Plans to be 'approved by the Council' in advance of planning application determination.	Yes						No	A	Supports policy of requiring master plans to be in place for allocated sites	Noted	N
02840004	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	D9	Yes	BBC supports CPBC's approach for protecting and enhancing heritage assets in the borough and has no specific concerns over the soundness of this policy.	Yes						No	A	Supports policy of protecting and enhancing heritage	Noted	N
02840005	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	Hou 6	Yes	The Council supports CPBC's approach to meeting identified needs for additional Gypsy and Traveller accommodation. BBC would like to emphasise the need for continued close and effective working on Gypsy and Traveller accommodation across Essex, through the EPOA and other strategic planning groups. Furthermore, it is important for CPBC	Yes						No	A	Supports policy for Gypsy and Traveller Accommodation	CPBC agrees to work with South Essex Authorities on Gypsy and Traveler accommodation and with EPOA to identify a transit site within Essex	N

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								to continue to engage with the ongoing EPOA programme of work to identify the need for a transit site within Essex, with any outcomes of this work factored into reviews of the CPLP.											
02840006	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	E1	Yes	BBC is broadly supportive of these policies and the CPLP's overall economic strategy. It is acknowledged that the provision of new employment land in and around town centres, and the safeguarding of economy use at existing sites may provide opportunities to broaden and diversify the local economy and provide employment opportunities for residents of a wider area both directly and indirectly through supplementing wider supply chains.	Yes						No	A	Supports economic policy for strategic development of employment land	Noted	N
02840007	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	E2	Yes	BBC is broadly supportive of these policies and the CPLP's overall economic strategy. It is acknowledged that the provision of new employment land in and around town centres, and the safeguarding of economy use at existing sites may	Yes						No	A	Supports policy for new floorspace in town centres	Noted	N

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								provide opportunities to broaden and diversity the local economy and provide employment opportunities for residents of a wider area both directly and indirectly through supplementing wider supply chains.											
02840008	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	TC1	Yes	BBC has no specific concerns over the soundness of these policies.	Yes						No	A	Has no concerns over the soundness of Town Centre and Retail policy	Noted	N
02840009	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	TC5	Yes	BBC has no specific concerns over the soundness of these policies.	Yes						No	A	No concerns over the soundness of Hot Food Takeaway policy	Noted	N
02840010	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	ENV1	Yes	BBC has no specific concerns over the soundness of this policy, or the wider environmental strategy	Yes						No	A	No concerns over the soundness of protecting and enhancing the landscape policy	Noted	N
02840011	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	SP4	Yes	BBC has no specific concerns over the soundness of this policy, or the wider infrastructure delivery strategy. BBC would, however, like to emphasise the importance of ensuring that the impacts of	Yes						No	A	No concerns over soundness of Developer Contributions policy	CPBC will continue to positively engage with the South Essex Councils through SEC and EPOA to ensure that the necessary	N

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								growth on key cross-boundary infrastructure including, schools, open spaces and healthcare services. This will require continued commitments to collaborative working, including through positive engagement between the Councils as a part of ASELA and the EPOA.										infrastructure requirements are in place to support growth	
02840012	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	T1	Yes	BBC is broadly supportive of these policies and the wider transport strategy proposed. BBC however, would like to highlight the need to keep under consideration the impacts of growth on shared infrastructure, such as on the A127. It is critical that the impacts of growth on the highway network are carefully considered and mitigated. In particular, BBC considers the adequate mitigation of the impacts of growth on the A127 and A129 to be paramount to achieving sustainable development in South Essex. The Council would welcome continued future cross-boundary engagement regarding shared highways and	Yes						No	A	Broadly supports CPBC Transport Strategy but adequate mitigation needs to be in place A127 and A129 to support growth.	CBPC recognises that congestion on A127 is an issue for growth in the region and will positively engage with BBC and other Essex authorities to ensure that impact of its growth and the growth from other authorities on transport network is carefully considered including A127 and A129	N

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								transportation matters and request that information regarding proposed infrastructure improvement plans are shared with officers prior to works being agreed.											
02840013	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	T2	Yes	BBC is broadly supportive of these policies and the wider transport strategy proposed. BBC however, would like to highlight the need to keep under consideration the impacts of growth on shared infrastructure, such as on the A127. It is critical that the impacts of growth on the highway network are carefully considered and mitigated. In particular, BBC considers the adequate mitigation of the impacts of growth on the A127 and A129 to be paramount to achieving sustainable development in South Essex. The Council would welcome continued future cross-boundary engagement regarding shared highways and transportation matters and request that information regarding proposed infrastructure improvement plans are	Yes						No	A	Broadly supports the policies on highway improvements but adequate mitigation needs to be in place A127 and A129 to support growth. Encouraged cross boundary collaboration to consider growth and transport in the area.	CPBC recognises that congestion on A127 is an issue for growth in the region and will positively engage with BBC and other Essex authorities to ensure that impact of its growth and the growth from other authorities on transport network is carefully considered including A127 and A129	N

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								shared with officers prior to works being agreed.											
02840014	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	T3	Yes	BBC is broadly supportive of these policies and the wider commitment to enhance active travel and public transport infrastructure. BBC would, however, like to emphasise the importance of ensuring the impacts of growth on sustainable transport networks are carefully considered and mitigated	Yes						No	A	Broadly supports enhanced active travel and public transport but most ensure that impacts of growth on sustainable transport networks are considered and mitigated if necessary.	CBPC recognises the need to carefully consider the impact of growth on sustainable transport networks and will positively engage with South Essex Authorities to Avoid, Minimise or Mitigate any impacts.	N
02840015	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	T4	Yes	BBC is broadly supportive of these policies and the wider commitment to enhance active travel and public transport infrastructure. BBC would, however, like to emphasise the importance of ensuring the impacts of growth on sustainable transport networks are carefully considered and mitigated	Yes						No	A	Broadly supports enhanced active travel and public transport but most ensure that impacts of growth on sustainable transport networks are considered and mitigated if necessary.	CBPC recognises the need to carefully consider the impact of growth on sustainable transport networks and will positively engage with South Essex Authorities to Avoid, Minimise or Mitigate any impacts.	N

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0485-0001	Individual	Teresa	Goodman		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050.	No				Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u>	<u>Y - Policy SD3(3)</u> 'Proposals must demonstrate how the SuDS feature(s) reflect and respond to the constraints of the specific geographic location , site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex, the Castle Point Strategic Flood Risk

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																		<p>Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.</p> <p><u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p><u>Consideration of All Sites</u></p> <p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). Green Belt/Grey</p>	<p>Assessment (SFRA) and recommendations/advice from statutory bodies (including EA, Essex LLFA).'</p>

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																		<p><u>Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.</p>	
04850002	Individual	Teresa	Goodman		Yes	C4					The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		No				The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0751-0001	Individual	SHARON	GOODMAN		Yes	SP3	No	Failed to consider strategic alternatives like north west thundersley.no credible five year housing land supply.	No	Consistent with national policy	The draft local plan is not consistent with national policy.does not meet the housing target for castle point.site selection ignores green belt/grey belt against new np of guidelines.the draft local plan is not justified.site selection strategy is biased and predetermined towards a no green belt build policy site selection is based on the over development of brown field. not considered all,no green belt/grey belt sites added,with the exclusion of north west thundersley,nppf guidelines state development should be directed away from areas at highest risk of flooding.suds measures are not appropriate for canvey island's unique geography and drainage infrastructure.the 3316 urban homes for canvey is not resident let.canvey west homes puts residents in the east at risk with emergency evacuation procedures.	Add north west thundersley site,187Ha,a green belt/greybelt./brown field site option for 7500 homes.reduce the urban housing target to 3500 from 6200,with canvey at 1050.total housing target of 11000.	No	Not Answered	Not Answered		No Five Year Housing Land Supply North West Thundersley Flood risk on Canvey Emergency Evacuation concerns	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	N

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																		<p>common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West</p>	

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																		<p>Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Flooding on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the</p>	

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																		<p>Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/</p>	

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0269001	Organisation	Annie	Gordon	Essex Wildlife Trust	Not Stated	ENV2	Yes	Policy ENV2: Coastal & Riverside Strategy While we strongly support the policy's strategic objectives and multi-functional approach to coastal management, we object to Policy ENV2 in its current form as it fails to meet the tests of soundness required for examination. Fundamental gaps in implementation render the policy ineffective for protecting Castle Point's internationally important coastal habitats. 2	No	Effectiveness	The policy demonstrates a strong strategic vision and appropriately integrates with regional frameworks including the Thames Estuary 2100 Plan, the Essex Local Nature Recovery Strategy, and South Essex Estuary Park initiative. However, we have concerns that Policy ENV2 fails the effectiveness test due to critical implementation gaps. The policy's effectiveness depends entirely on preparation of a Riverside Strategy, yet no timeline, governance arrangements, or resource commitments are provided for this fundamental delivery mechanism. This creates a policy vacuum that could persist for some considerable time while leaving internationally important coastal habitats without adequate protection. During the potentially lengthy strategy preparation period, development proposals affecting coastal areas will lack clear guidance on biodiversity protection requirements. This is particularly problematic given that Castle Point's coastal areas contain Special Protection Areas and Special Areas of Conservation supporting nationally significant populations of wintering waterfowl and breeding birds. The policy lacks sufficient detail on how coastal habitat enhancement will be achieved and fails to acknowledge specific habitat types requiring protection. Castle Point's coastal grazing marshes, mudflats, and saltmarsh habitats are critical for	Suggested Amendments To address these fundamental concerns, we consider three critical amendments essential for the policy to be found sound. First, the policy should include a clear and binding timeline for Riverside Strategy completion, for example completion within two years of plan adoption, supported by defined partnership arrangements and resource commitments. Second, the policy should provide interim guidance for determining applications affecting coastal areas prior to strategy completion. This should include specific criteria for protecting coastal	Not Stated		No	A	Essex Wildlife Trust comment on the following policies, including recommendations for mods. Policy ENV2: Coastal & Riverside Strategy Strongly support the policy's strategic objectives and multi-functional approach to coastal management, we object to Policy ENV2 in its current form as it fails to meet the tests of soundness required for examination. Fundamental gaps in implementation render the policy ineffective for protecting Castle Point's internationally important coastal habitats. Concerns that Policy ENV2 fails the effectiveness test due to critical implementation gaps. The policy's effectiveness depends entirely on preparation of a Riverside Strategy, yet no timeline, governance arrangements, or resource commitments are provided for this fundamental delivery mechanism. This creates a policy vacuum that could persist for some considerable time	Policy ENV2 - Comments noted, some of the concerns are already covered. Priority habitats are already protected by Policy ENV3. Part 6 of Policy ENV2 already covers much of the expressed concerns 'Development proposals must ensure areas that are identified as an Area of Particular Importance for Biodiversity (APIBs) within the Essex Local Nature Recovery Strategy (LNRS) are protected and where possible enhanced.' However, the policy and text may benefit from more clarity and cross-references - see proposed mods.	Y Policy ENV2 – Coastal & Riverside Strategy 1. Working with the Environment Agency, ECC Lead Local Flood Authority, neighbouring authorities, the community and other relevant stakeholders the Council will prepare a Riverside Strategy. The Riverside Strategy will: a. Looking across administrative boundaries, covering the Bowers Marshes,

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											wildlife and face increasing pressure from sea level rise, increasing recreational disturbance and development. These internationally important habitats need explicit protection measures that operate immediately rather than awaiting future strategy development. The policy also fails to establish clear partnership governance arrangements with Natural England, the Environment Agency and neighbouring authorities, despite acknowledging their essential role. Without defined roles, responsibilities, and resource commitments, there is no certainty that the Riverside Strategy will be delivered within any reasonable timeframe.	habitats, contributing to LNRS strategic opportunities, and ensuring flood defence improvements deliver biodiversity benefits alongside flood protection. Third, the policy should explicitly reference the specific coastal habitat types requiring protection, including coastal grazing marsh, mudflats, saltmarsh, and associated terrestrial habitats,					while leaving internationally important coastal habitats without adequate protection. During the potentially lengthy strategy preparation period, development proposals affecting coastal areas will lack clear guidance on biodiversity protection requirements. This is particularly problematic given that Castle Point's coastal areas contain Special Protection Areas and Special Areas of Conservation supporting nationally significant populations of wintering waterfowl and breeding birds. The policy lacks sufficient detail on how coastal habitat enhancement will be achieved and fails to acknowledge specific habitat types requiring protection. Castle Point's coastal grazing marshes, mudflats, and saltmarsh habitats are critical for wildlife and face increasing pressure from sea level rise, increasing recreational disturbance and development. These internationally important habitats need explicit		Canvey Island and Hadleigh Marshes Policy Unit areas as set out in the Thames Estuary 2100 Plan; b. Allow for and plan for improvements to and management of the flood defences; c. Improve access to and enjoyment of the coast, creating cross boundary links where possible; d. Enhance the cultural and social value of the coastal

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																	<p>protection measures that operate immediately rather than awaiting future strategy development. The policy also fails to establish clear partnership governance arrangements with Natural England, the Environment Agency and neighbouring authorities, despite acknowledging their essential role. Without defined roles, responsibilities, and resource commitments, there is no certainty that the Riverside Strategy will be delivered within any reasonable timeframe. Suggested Amendments: To address these fundamental concerns, we consider three critical amendments essential for the policy to be found sound. First, the policy should include a clear and binding timeline for Riverside Strategy completion, for example completion within two years of plan adoption, supported by defined partnership arrangements and resource commitments. Second, the policy should provide interim</p>		<p>areas; and e. Enhance the ecological networks along the coast and coastal habitats. 2. Proposals will not be supported where they conflict with the aims of the Riverside Strategy. 3. Proposals which deliver the multi-functional green and blue infrastructure recommendations of the South Essex Estuary Park (SEE Park) will be supported</p>

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																	<p>guidance for determining applications affecting coastal areas prior to strategy completion. This should include specific criteria for protecting coastal habitats, contributing to LNRS strategic opportunities, and ensuring flood defence improvements deliver biodiversity benefits alongside flood protection.</p> <p>Third, the policy should explicitly reference the specific coastal habitat types requiring protection, including coastal grazing marsh, mudflats, saltmarsh, and associated terrestrial habitats, providing immediate clarity on biodiversity priorities while the detailed strategy is being developed.</p>		<p>d. 4. Be subject to a Habitats Regulations Assessment in order to demonstrate no adverse effects on site integrity.</p> <p>5. Development proposals must be designed to enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).</p> <p>6. Development proposals must</p>

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																			ensure areas that are identified as an Area of Particular Importance for Biodiversity (APIBs) within the Essex Local Nature Recovery Strategy (LNRS), and priority habitats such as coastal floodplain grazing marsh, mudflats and coastal saltmarsh are protected and where possible enhanced. 7. Proposals for flood defence improvements should seek to

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																			<p>deliver biodiversity benefits alongside flood protection.</p> <p>18.15 It is important for future generations that new development does not hamper the delivery of the Riverside Strategy, and to this end, it will be a material planning consideration when determining applications within the vicinity of the coast. Coastal and riverside areas are subject to environmental protectio</p>

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																			n under elements 3-7 of policy ENV2, as well as other policies within the plan, which provide assurance of their appropriate consideration and protection in the interim period prior to the publication of the Riverside Strategy.

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0269002	Organisation	Ann ie	Gord on	Essex Wildlife Trust	Not Stated	ENV 3	Yes	Policy ENV3: Securing Nature Recovery and Biodiversity Net Gain We conditionally support Policy ENV3, recognising its strong ambitions for biodiversity protection and enhancement in Castle Point. The policy demonstrates good alignment with national policy requirements and exceeds minimum biodiversity net gain standards through its 20% requirement on greenfield sites. The policy appropriately recognises that the statutory framework under the Environment Act 2021 provides the implementation mechanisms for biodiversity net gain, including automatic conditions, enforcement powers, and 30-year maintenance requirements. The policy meets the tests for being positively prepared and consistent with national policy. We particularly welcome the integration with Essex-wide strategies including the Local Nature Recovery Strategy and the Essex Coast Recreational Avoidance and Mitigation Strategy. The	Yes		The policy demonstrates good justification for its higher biodiversity net gain requirements, with clear rationale based on viability testing and appropriate differentiation between brownfield and greenfield sites. We strongly support the ambitious approach of requiring 20% biodiversity net gain on greenfield sites, which reflects Castle Point's important role in the wider Essex nature recovery network.	However, we have concerns regarding the policy's long-term effectiveness in three key areas that require strengthening to ensure the policy fully meets the effectiveness test for soundness. Key Areas Requiring Amendment We have identified three critical improvements necessary for the policy to be fully effective. First, the identification of only two preferred sites for off-site biodiversity net gain provision may be insufficient to meet likely demand over the plan period. Additional strategic sites should be identified to prevent delivery bottlenecks that could undermine the	Not Stated		No	A	Conditionally support ENV3. The policy demonstrates good alignment with national policy requirements and recognises the statutory framework under the Environment Act 2021 provides the implementation mechanisms for biodiversity net gain, including automatic conditions, enforcement powers, and 30-year maintenance requirements. The policy meets the tests for being positively prepared and consistent with national policy. We particularly welcome the integration with Essex-wide strategies including the Local Nature Recovery Strategy and the Essex Coast Recreational Avoidance and Mitigation Strategy. The	Mods proposed to address the concerns	Y 18.31 The Castle Point Green and Blue Infrastructure Strategy and Open Space Assessment have both considered a number of sites across Castle Point for their potential suitability for off-site biodiversity net gain. Of those sites that have been assessed as having significant potential biodiversity enhancement and are either owned by the Council

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								policy appropriately recognises the biodiversity hierarchy and implements Habitats Regulations requirements, while incorporating relevant statutory duties under the Natural Environment and Rural Communities Act 2006 and Wildlife and Countryside Act 1981.				policy's objectives. The policy should include a commitment to regularly review and expand the list of preferred off-site sites based on demand and availability. Second, the policy lacks clear criteria for selecting future off-site biodiversity net gain sites. Establishing transparent selection criteria would provide certainty for developers and landowners while ensuring sites contribute effectively to the Local Nature Recovery Strategy objectives. These criteria should prioritise sites that will enhance ecological connectivity, are capable of supporting priority habitats and species,					<p>Countryside Act 1981.3</p> <p>The policy demonstrates good justification for its higher biodiversity net gain requirements, with clear rationale based on viability testing and appropriate differentiation between brownfield and greenfield sites. We strongly support the ambitious approach of requiring 20% biodiversity net gain on greenfield sites, which reflects Castle Point's important role in the wider Essex nature recovery network.</p> <p>However, we have concerns regarding the policy's long-term effectiveness in three key areas that require strengthening to ensure the policy fully meets the effectiveness test for soundness.</p> <p>ENV3 - Key Areas Requiring Amendment We have identified three critical improvements necessary for the policy to be fully effective. First, the identification of only two preferred sites for off-site biodiversity net</p>		or have been promoted for inclusion in the Plan for biodiversity, are identified as the first tranche of preferred offsite biodiversity net gain sites. The need for further off-site biodiversity net gain sites will be kept under review and the preferred list expanded further, in response to demand and availability.

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												and will contribute to landscape-scale nature recovery. Third, while the policy references the Essex Local Nature Recovery Strategy, it could strengthen the integration between biodiversity net gain delivery and LNRS implementation. The policy should explicitly encourage biodiversity net gain provision in LNRS opportunity areas and consider how strategic significance multipliers could incentivise habitat creation in locations that maximise benefits for nature recovery. Recommended Policy Additions To address these concerns, we					gain provision may be insufficient to meet likely demand over the plan period. Additional strategic sites should be identified to prevent delivery bottlenecks that could undermine the policy's objectives. The policy should include a commitment to regularly review and expand the list of preferred off-site sites based on demand and availability. Second, the policy lacks clear criteria for selecting future off-site biodiversity net gain sites. Establishing transparent selection criteria would provide certainty for developers and landowners while ensuring sites contribute effectively to the Local Nature Recovery Strategy objectives. These criteria should prioritise sites that will enhance ecological connectivity, are capable of supporting priority habitats and species, and will contribute to landscape-scale nature recovery. Third, while the policy references the Essex Local Nature Recovery		

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												<p>recommend adding text to commit the Council to maintaining an up-to-date list of preferred off-site biodiversity net gain sites, with regular reviews to ensure adequate provision. The policy should include criteria for site selection focusing on ecological connectivity, priority habitat creation, and alignment with Local Nature Recovery Strategy objectives. Additionally, the policy should explicitly encourage off-site biodiversity net gain provision within LNRS opportunity areas and consider how the strategic significance multiplier can be used to direct habitat creation to</p>					<p>Strategy, it could strengthen the integration between biodiversity net gain delivery and LNRS implementation. The policy should explicitly encourage biodiversity net gain provision in LNRS opportunity areas and consider how strategic significance multipliers could incentivise habitat creation in locations that maximise benefits for nature recovery.</p> <p>Recommended Policy Additions To address these concerns, we recommend adding text to commit the Council to maintaining an up-to-date list of preferred off-site biodiversity net gain sites, with regular reviews to ensure adequate provision. The policy should include criteria for site selection focusing on ecological connectivity, priority habitat creation, and alignment with Local Nature Recovery Strategy objectives.</p> <p>Additionally, the policy should explicitly encourage off-site biodiversity net gain</p>		

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												locations that maximise landscape-scale conservation benefits. Protected Species Considerations We welcome the policy's recognition of protected species but recommend strengthening provisions for badger protection. Castle Point has a notable badger population, and development pressure increasingly creates conflicts between badgers and residents when animals access gardens and cause damage through foraging activities. This issue is exacerbated by new developments encroaching on traditional badger territories. We					provision within LNRS opportunity areas and consider how the strategic significance multiplier can be used to direct habitat creation to locations that maximise landscape-scale conservation benefits. Protected Species Considerations We welcome the policy's recognition of protected species but recommend strengthening provisions for badger protection. Castle Point has a notable badger population, and development pressure increasingly creates conflicts between badgers and residents when animals access gardens and cause damage through foraging activities. This issue is exacerbated by new developments encroaching on traditional badger territories. We developed a Badger Protection Plan in collaboration with Castle Point Borough Council in 2020, which provides comprehensive guidance for addressing these challenges. The policy should reference this guidance and require		

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												developed a Badger Protection Plan in collaboration with Castle Point Borough Council in 2020, which provides comprehensive guidance for addressing these challenges. The policy should reference this guidance and require badger protection plans for developments within 1km of known badger setts. Key mitigation measures should include maintaining habitat connectivity through wildlife corridors, implementing appropriate fencing specifications to guide badger movement away from vulnerable areas, and ensuring development design minimises habitat					badger protection plans for developments within 1km of known badger setts. Key mitigation measures should include maintaining habitat connectivity through wildlife corridors, implementing appropriate fencing specifications to guide badger movement away from vulnerable areas, and ensuring development design minimises habitat fragmentation. Effective badger mitigation requires early assessment of badger activity, coordination with neighbouring developments to avoid cumulative impacts, and long-term monitoring to ensure protection measures remain effective. The policy could be strengthened by explicitly requiring compliance with the Essex Wildlife Trust Badger Protection Plan guidance where badger territories may be affected by development.		

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												fragmentation. Effective badger mitigation requires early assessment of badger activity, coordination with neighbouring developments to avoid cumulative impacts, and long-term monitoring to ensure protection measures remain effective. The policy could be strengthened by explicitly requiring compliance with the Essex Wildlife Trust Badger Protection Plan guidance where badger territories may be affected by development.								

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02690003	Organisation	Annie	Gordon	Essex Wildlife Trust	Not Stated	ENV 4	Yes	Policy ENV4: Local Wildlife and Geological Sites While we support several elements of the policy, we must formally object to Policy ENV4 as unsound due to fundamental concerns with paragraph 4. We support paragraphs 1-3 of Policy ENV4, which provide an appropriate framework for the conservation and enhancement of locally designated sites. These paragraphs demonstrate a clear commitment to active conservation and enhancement of both biodiversity and geodiversity interests, supported by the comprehensive LoWS Review (2023-2024) and formal endorsement from the Essex Local Nature Partnership. We also welcome paragraphs 5-6, which properly integrate the policy with Essex Local Nature Recovery Strategy (LNRS) habitat priority measures and Areas of Particular Importance for Biodiversity. This strategic connectivity is essential for successful nature recovery and demonstrates forward-	No	Justified, Effective	However, we strongly object to Policy ENV4 as unsound due to paragraph 4, which permits development on Local Wildlife Sites with mitigation. This provision fails multiple tests of soundness and undermines the policy's overall effectiveness. Failure of the Justified Test Paragraph 4 contains a fundamental logical contradiction. Local Wildlife Sites are designated specifically because they are significant biodiversity assets that merit protection. If these sites could be simply replaced through mitigation measures, they would not meet the criteria for designation in the first place. The policy therefore undermines its own rationale by allowing development with mitigation on sites that have been scientifically identified as biodiversity assets of county-level importance. Inconsistency with National Policy The provision directly conflicts with the National Planning Policy Framework, particularly paragraph 179, which requires planning policies to "safeguard components of local wildlife-rich habitats." Safeguarding means protection and preservation, not managing decline through mitigation. Additionally, the policy conflicts with the Government's 30 by 30 commitment, which requires protecting 30% of land by 2030, and undermines the very sites identified as core components of the nature recovery network in the Essex LNRS. Effectiveness Concerns Paragraph 4 cannot	Recommended Modification To address these fundamental concerns, we recommend replacing paragraph 4 with the following: "Development proposals that would result in the loss of or harm to a Local Wildlife Site, Local Geological Site, or Potential Local Wildlife Site will be refused unless there are exceptional reasons to justify development in that location. Proposals must demonstrate that every reasonable effort has been taken to minimise harm through avoidance, and any residual harm must be fully mitigated." This modification would align the policy with the scientific basis for site	Not Stated		No	A	Formally object to Policy ENV4 as unsound due to fundamental concerns with paragraph 4. But support several elements of the policy. We support paragraphs 1-3 of Policy ENV4, which provide an appropriate framework for the conservation and enhancement of locally designated sites. These paragraphs demonstrate a clear commitment to active conservation and enhancement of both biodiversity and geodiversity interests, supported by the comprehensive LoWS Review (2023-2024) and formal endorsement from the Essex Local Nature Partnership. We also welcome paragraphs 5-6, which properly integrate the policy with Essex Local Nature Recovery Strategy (LNRS) habitat priority measures and Areas of Particular Importance for Biodiversity. This strategic connectivity is essential for successful nature recovery and demonstrates forward-	Comments noted. Agree to proposed mod.	Y ENV4 - Replace paragraph 4 with the following: ENV4 - Replace paragraph 4 with the following: "Development proposals that would result in the loss of or harm to a Local Wildlife Site, Local Geologic al Site, or Potential Local Wildlife Site will not be permitted be refused unless it can be clearly demonstrated that every reasonable effort has been taken to

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								thinking planning that aligns with national biodiversity objectives.			effectively deliver biodiversity conservation or nature recovery objectives. The subjective standard of "every reasonable effort" provides no measurable criteria for enforcement, while the concept of "full mitigation" is scientifically questionable for habitats of high and very high distinctiveness. The policy creates a fundamental contradiction with Policy ENV3's biodiversity net gain requirements and fails to address the cumulative impact of individual site losses on landscape-scale ecological functions. Statutory Duty Implications Paragraph 4 raises concerns regarding the Council's statutory biodiversity duty under Section 40 of the Natural Environment and Rural Communities Act 2006. By permitting development on designated biodiversity sites, the policy represents a failure to have proper regard to biodiversity conservation and enhancement. This approach undermines the Council's ability to properly discharge its legal obligations and conflicts with best practice demonstrated by other local authorities.	designation, support statutory biodiversity duties, protect core components of the nature recovery network, and provide policy coherence while maintaining appropriate flexibility for truly exceptional circumstances.				thinking planning that aligns with national biodiversity objectives. However, we strongly object to Policy ENV4 as unsound due to paragraph 4, which permits development on Local Wildlife Sites with mitigation. This provision fails multiple tests of soundness and undermines the policy's overall effectiveness. Failure of the Justified Test Paragraph 4 contains a fundamental logical contradiction. Local Wildlife Sites are designated specifically because they are significant biodiversity assets that merit protection. If these sites could be simply replaced through mitigation measures, they would not meet the criteria for designation in the first place. The policy therefore undermines its own rationale by allowing development with mitigation on sites that have been scientifically identified as biodiversity assets of county-level importance. ENV4 - Recommended		minimise the harm arising through avoidance, and any residual harm arising is fully mitigated - there are exceptional reasons to justify development in that location. Proposals must demonstrate that every reasonable effort has been taken to minimise harm through avoidance, and any residual harm must be fully mitigated."	

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																	<p>Modification To address these fundamental concerns, we recommend replacing paragraph 4 with the following: "Development proposals that would result in the loss of or harm to a Local Wildlife Site, Local Geological Site, or Potential Local Wildlife Site will be refused unless there are exceptional reasons to justify development in that location. Proposals must demonstrate that every reasonable effort has been taken to minimise harm through avoidance, and any residual harm must be fully mitigated."</p> <p>This modification would align the policy with the scientific basis for site designation, support statutory biodiversity duties, protect core components of the nature recovery network, and provide policy coherence while maintaining appropriate flexibility for truly exceptional circumstances.</p>		

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0269004	Organisation	Annie	Gordon	Essex Wildlife Trust	Not Stated	ENV5	Yes	4. Policy ENV5: Design Features that Encourage Biodiversity We support Policy ENV5 as a positive step toward integrating species conservation into planning policy. The policy addresses genuine conservation priorities for species facing significant population declines and provides clear, implementable requirements.	Yes		The policy meets the tests of soundness, though its ultimate effectiveness will depend on robust implementation and enforcement by the Council. The policy is positively prepared, addressing objectively assessed conservation needs for priority species based on evidence from the Castle Point Green and Blue Infrastructure Study and Essex Local Nature Recovery Strategy. The species selection appropriately focuses on swifts (red-listed with severe population decline), hedgehogs (now officially vulnerable to extinction), and bats (facing ongoing habitat pressures from artificial lighting and development). The policy is well-justified with clear evidence from authoritative sources and follows established best practice guidance. The requirements are proportionate and technically deliverable - swift brick requirements follow proven British Standard specifications, hedgehog gates represent practical design modifications, and bat lighting requirements reference established Institute of Lighting Professionals guidance. The policy is consistent with national policy, directly implementing NPPF paragraph 187 requirements and aligning with statutory species protection legislation. Conservation Benefits and Implementation The policy addresses critical conservation needs. Swift populations have declined by over 50% primarily due to loss of nesting opportunities in modern	Recommendations for Policy Enhancement While the policy addresses the most critical species priorities, we recommend the Council considers expanding the policy to include additional design features that could further enhance biodiversity outcomes. Several other integrated building features could complement the current requirements: Sparrow Terraces for communal nesting sparrows (declined by 50% since mid-1970s, red-listed), Starling Boxes for this gregarious species (declined by 66%, also red-listed), Bee Bricks for solitary bees	Not Stated		No	A	Supports Policy EN5 Suggests several other species that could be specifically targetted including House Sparrows, Starlings and Soliray Bees.	Support noted. The Council has targetted just those species specifically highlighted in the NPPF a this stage (See NPPF 187d)	N

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											buildings, while hedgehogs are now officially vulnerable to extinction with habitat fragmentation being a key threat. The policy requirements will help maintain nesting opportunities and habitat connectivity respectively, while bat-sensitive lighting protects important foraging routes. However, the policy's conservation value will ultimately depend on effective implementation and long-term monitoring. The Council should ensure that installed features are properly positioned, maintained, and monitored for occupancy and effectiveness. Clear guidance on optimal placement and coordination with landscape design will be essential to maximize conservation benefits.	(250 of Britain's 270 bee species, though scientific opinion remains divided on effectiveness), and Bat Access Tiles as alternatives to integrated boxes. We suggest these additional features could be included as optional enhancements or considered for future policy updates, allowing the Council to gain experience with the core requirements while building toward more comprehensive biodiversity integration. Implementation Considerations The policy would benefit from clear developer guidance on feature specifications and placement to ensure consistent,								

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												high-quality implementation. Regular assessment of feature usage could inform future policy refinements and demonstrate conservation outcomes. Brighton & Hove Council's experience with mandatory bee bricks since 2020 could provide useful lessons for expanding requirements. We would emphasise that effective enforcement and monitoring will be crucial to achieving the policy's conservation objectives. Without proper implementation oversight, even well-designed policies may fail to deliver meaningful biodiversity benefits.								

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1148001	Individual	Brenda	Gorham			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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																		<p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u></p>	

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																		Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
11480002	Individual	Brenda	Gorham			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
11	Individual	Brenda	Gorham			C4					The number of Canvey West homes puts residents in the East						Development at West Canvey will impact	The safety of all Castle Point	N

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48-0003											at risk with emergency evacuation procedures.						emergency evacuation procedures for those residents living at East Canvey	residents is a priority and has been considered within the Castle Point Plan	
0887-0001	Individual	Kevin	Gosling		Yes	HAD 4	No		No	Positively prepared	Traffic, and the amount of homes on the site at scrub lane	Less houses, 114 new homes on this site.. is too large For the area.. Traffic will be impossible	No	Not Answered	Not Answered	A	Objecting to HAD4: Traffic Density	<p>Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation.</p> <p>Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.</p>	N

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00190001	Individual	Andrew	Gosnold		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for	No	Positive, Effective, Justified, Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land	Not Stated		No		Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. <ul style="list-style-type: none"> Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. Challenges the soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal. Calls for modifications to reduce pressure on Canvey and include North West Thundersley. 	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground <ul style="list-style-type: none"> North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) 	N

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								residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in			robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the	supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.						outlines why North West Thundersley was not preferred. <ul style="list-style-type: none"> • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. 	

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								planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its			balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the										

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								environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the			same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related										

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								Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by			to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of										

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								<p>infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.</p>			<p>contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing</p>										

I D R ef	Individual/ Organisatio n/Agent?	Firs t Na me	Last Nam e	If orga nisat ion - nam e	Has agreed to public ation of Name/ Comm ents?	Poli cy/P ara No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a . So und?	3b. Positive/Effect ive/Justified/C onsistent?	3c. Explanation	4. Suggested modifications	5. Wis h to part icip ate in exa m	6. Why ?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required				
											target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of												

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											<p>accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure,</p>													

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											<p>all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24-28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green</p>													

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											<p>Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest – and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to</p>												

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											reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.											
00190002	Individual	Andrew	Gosnold		Yes	Forward	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its	No				Not Stated		No		• Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N			

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								expectation that Statements of Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											

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10390001	Individual	Duncan	Gotobed		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply	No	Justified, Consistent with national policy	<p>The draft local plan fails to meet the tests of soundness on both justification and consistency with national policy.</p> <p>Inconsistency with National Policy: The plan does not align with national policy requirements and fails to meet Castle Point's housing targets. The site selection process disregards Green Belt and Grey Belt considerations, contrary to updated NPPF guidelines that require proper assessment of these designations.</p> <p>Lack of Justification: The site selection strategy demonstrates predetermined bias toward a "no Green Belt build" policy without adequate justification. The approach relies excessively on overdeveloping brownfield sites rather than conducting a comprehensive assessment of all available options. Notably, Green Belt and Grey Belt sites have been systematically excluded from consideration, including North West Thundersley.</p> <p>Flood Risk and Drainage Concerns: The plan contradicts NPPF guidelines requiring development to be directed away from areas of highest flood risk. The proposed SUDS measures are inappropriate for Canvey Island's unique geographical conditions and existing drainage infrastructure, potentially exacerbating flood risks.</p>	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No	Not Answered	Not Answered	A	<p>Not meeting housing targets</p> <p>Five year housing land supply</p> <p>North west thundersley Green/Grey Belt</p> <p>Flood Risk on Canvey</p> <p>Emergency evacuation</p>	<p>Housing Need</p> <p>The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology.</p> <p>However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point.</p> <p>The Castle Point Plan Regulation 19 Draft makes</p>	N

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											Community Impact and Safety: The allocation of 3,316 urban homes for Canvey Island lacks adequate community consultation and resident input. Furthermore, the proposed Canvey West development compromises emergency evacuation procedures, placing existing residents in the eastern areas at increased risk during emergency situations.							provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan	

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																		and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11	

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																		<p>onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport</p>	

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																		<p>evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle</p>	

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																		<p>Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out</p>	

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																		above. Flood risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in	

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																		relation to Canvey. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/	

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10390002	Not Answered	Duncan	Gotobed		Not Answered	C7	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Effective, Justified, Consistent with national policy	<p>Inconsistency with National Policy: The draft local plan does not align with national policy requirements and fails to meet Castle Point's housing targets. Site selection disregards Green Belt and Grey Belt considerations, contrary to updated NPPF guidelines. The plan violates NPPF principles by directing development toward areas at highest flood risk rather than away from them.</p> <p>Lack of Justification: The site selection strategy demonstrates predetermined bias toward a "no Green Belt build" policy without proper justification. The approach relies on overdeveloping brownfield sites while systematically excluding Green Belt and Grey Belt sites from consideration (e.g. North West Thundersley). An unsound plan will expose all Green Belt sites to speculative development pressure, when Green Belt sites on Canvey West require total protection from government intervention.</p> <p>Policy Ineffectiveness: Policy C7 lacks clear delivery mechanisms and ongoing maintenance commitments, making it fundamentally ineffective. The 2015 Canvey Island 6 Point Plan recommended dredging to increase lake capacity for flood storage, yet nearly 10 years later, these critical recommendations remain undelivered. Policy C7 repeats identical promises</p>	<p>HOUSING MODIFICATION S: Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.</p> <p>LAKE DELIVERY FRAMEWORK: Establish firm 2-year timeline for comprehensive lake dredging with dedicated funding and delivery agency. Create annual maintenance dredging schedule with long-term budget allocation. Set measurable targets for lake capacity increase and water quality improvements. Designate responsible</p>	No	Not Answered		A	Supports the vision of C7 but wants more commitment to delivery mechanisms, timescales and maintenance and engage with friends of canvey lake	Comments noted. The purpose of Policy C7 is to improve the space as a multifunctional green space and include a long term management plan to ensure its upkeep is maintained	N

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											<p>without addressing why previous commitments failed or providing concrete delivery timelines, funding sources, or maintenance schedules.</p> <p>Infrastructure and Safety Concerns: The proposed 3,316 urban homes for Canvey lacks meaningful resident consultation. Canvey West development compromises emergency evacuation procedures, placing eastern residents at increased risk. This overdevelopment policy will strain highways and traffic capacity, overwhelm inadequate infrastructure, exceed sewage system capacity, exploit poor drainage systems, and increase flood risks to Canvey Lake.</p> <p>SUDS Inappropriateness: Proposed SUDS measures are unsuitable for Canvey Island's unique geography and drainage infrastructure.</p> <p>Support for C7 Vision with Implementation Concerns: While supporting Policy C7's vision for improving Canvey Lake, flood risk reduction, long-term management planning, water quality improvements, and habitat enhancement, the policy lacks concrete delivery mechanisms. Given CPBC's decade-long multi-agency partnership has failed to deliver meaningful outcomes for Canvey Lake's complex environmental and infrastructure needs, Policy</p>	<p>agency for ongoing lake management with annual progress reporting and community consultation.</p> <p>COMMUNITY ENGAGEMENT: Engage with Friends of Canvey Lake, a community group, with 2.5k members championing the reset of Canvey Lake to its pre-2010 conditions, to ensure resident-led lake management improvements.</p>								

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											C7 provides no commitments regarding funding sources, delivery timelines, or maintenance responsibilities.								

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10420001	Individual	Andrea	Gotobed		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	<p>The draft local plan is not sound because it doesn't follow national policy and isn't properly justified.</p> <p>Not Following National Policy: The plan doesn't meet national policy rules and fails to hit Castle Point's housing targets. The way they've chosen sites ignores Green Belt and Grey Belt land, which goes against the updated national planning guidelines that say these areas must be properly considered.</p> <p>Poor Justification: The site selection is biased - they've already decided not to build on Green Belt land without giving good reasons why. They're trying to cram too many houses onto brownfield sites instead of looking at all the options available. They've deliberately ignored Green Belt and Grey Belt sites, e.g. for North West Thundersley.</p> <p>Flood Risk Problems: The plan goes against national guidelines that say new housing should be kept away from flood risk areas. The drainage solutions they're proposing won't work properly on Canvey Island because of our unique geography and existing drainage problems, which could make flooding worse.</p> <p>Impact on Residents: The 3,316 new homes planned for Canvey Island haven't been properly discussed with local residents. The Canvey West</p>	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000	No	Not Answered	Not Answered	A	Not meeting housing targets Five year housing land supply North west thundersley Green/Grey Belt Flood Risk on Canvey Emergency evacuation	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes	N

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											development will make it harder for people living in the east of the island to evacuate safely in an emergency, putting them at greater risk.							provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan	

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10420002	Not Answered	Andrea	Gotobed		Not Answered	C7	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Effective, Justified, Consistent with national policy	<p>Not Following National Policy: The draft local plan doesn't follow national policy rules and fails to meet Castle Point's housing targets. The way they've chosen sites ignores Green Belt and Grey Belt land, which goes against updated national planning guidelines. The plan breaks national rules by putting new housing in flood risk areas instead of keeping it away from them.</p> <p>Poor Justification: The site selection is biased - they've already decided not to build on Green Belt land without giving proper reasons why. They're cramming too many houses onto brownfield sites while deliberately ignoring Green Belt and Grey Belt options (e.g. North West Thundersley). A weak plan like this will put all Green Belt sites at risk from developers, when Green Belt areas on Canvey West need complete protection from government interference.</p> <p>Policy C7 Doesn't Work: Policy C7 has no clear plans for how things will actually get done or who will pay for ongoing maintenance. Back in 2015, the Canvey Island 6 Point Plan said the lake needed dredging for flood storage - nearly 10 years later, nothing has happened. Policy C7 makes the same promises without explaining why previous plans failed or providing proper timelines, funding, or maintenance plans.</p>	<p>HOUSING MODIFICATION S: Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.</p> <p>LAKE DELIVERY FRAMEWORK: Establish firm 2-year timeline for comprehensive lake dredging with dedicated funding and delivery agency. Create annual maintenance dredging schedule with long-term budget allocation. Set measurable targets for lake capacity increase and water quality improvements. Designate responsible</p>	No	Not Answered		A	Supports the vision of C7 but wants more commitment to delivery mechanisms, timescales and maintenance and engage with friends of canvey lake	Comments noted. The purpose of Policy C7 is to improve the space as a multifunctional green space and include a long term management plan to ensure its upkeep is maintained	N

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											<p>Infrastructure and Safety Problems: The 3,316 new homes planned for Canvey haven't been properly discussed with residents. Canvey West development will make emergency evacuations harder for people in the east, putting them at greater risk. This overdevelopment will overload roads and traffic, overwhelm poor infrastructure, exceed sewage capacity, strain inadequate drainage systems, and increase flood risks to Canvey Lake.</p> <p>Drainage Solutions Won't Work: The proposed drainage measures aren't suitable for Canvey Island's unique geography and existing drainage problems.</p> <p>Canvey Lake Vision While the goals of Policy C7 are good - reducing flood risks, better management, cleaner water, and improving wildlife - the policy has no proper delivery plans. Without learning from the 6 Point Plan's decade of delays, Policy C7 will just become another broken promise while flood risks keep getting worse.</p>	<p>agency for ongoing lake management with annual progress reporting and community consultation.</p> <p>COMMUNITY ENGAGEMENT: Engage with Friends of Canvey Lake, a community group, with 2.5k members championing the reset of Canvey Lake to its pre-2010 conditions, to ensure resident-led lake management improvements.</p>								

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089-0001	Individual	Sean	Gough		Yes	SP3	No	Failed to consider strategic alternatives such as North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, needing planning objections with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, and Hadleigh at 305. Total housing target of 11,000	No	Not Answered	Not Answered	A	No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	N

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											<p>farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction.</p> <p>We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.</p>											<p>common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West</p>	

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																		<p>Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review,</p>	

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																		backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter	

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																		<p>the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Support for HAD2 Noted.</p> <p>A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6</p>	

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12240001	Individual	Dale	Gowler			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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																		<p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest Thundersley</u> was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u></p>		

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																		Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
12240002	Individual	Dale	Gowler			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
12	Individual	Dale	Gowler			C4					The number of Canvey West homes puts residents in the East						Development at West Canvey will impact	The safety of all Castle Point	N

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240003											at risk with emergency evacuation procedures.						emergency evacuation procedures for those residents living at East Canvey	residents is a priority and has been considered within the Castle Point Plan	
07240001	Individual	Denise	Grace Auger		Yes	Whole Plan	Yes		No	Positively prepared			No	Not Answered	Not Answered		Castle Point Plan is not sound.	Comments noted.	N
03150001	Individual	Irena	Grant			SP3	Not Stated	I have only just been made aware of this and see the consultation is now closed! Why was it not more publicised?	No	Consistent with National Policy	I find the proposal to be unsound as the plan is for 7 thousand new homes but the Govt target for Castlepoint, as far as I can see, is twice that figure. Why hasn't the site at North West Thundersley been added? It has a good route in and out of the borough (with a few tweeks) and it will not further congest areas that are already congested on a daily, if not hourly basis, such as Hadleigh A13. I hope you will add my objection to your consultation and if possible reopen/extend the consultation with a greater publication of its existence so more residents are able to submit their views.						Objects to the exclusion of North west Thundersley	North-West Thundersley Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	N

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12740001	Individual	Theresa	Grant			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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																		<p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u></p>	

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																		Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
12740002	Individual	The resa	Grant			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
1274003	Individual	Theresa	Grant			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0347001	Individual	Diane	Gray			Whole Plan	Yes	Kindly note that I believe the plan has been legally prepared and sound.	Yes								Castle Point Plan is sound and legally compliant,	Support Noted	N
1295001	Individual	James	Gray			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.				Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)	

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								no credible five-year housing land supply.			3316 urban homes for Canvey is not resident led						state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability	

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																		Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
129500	Individual	Jam	Gray			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to	N

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02								Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.										the sites environment	
1295-0003	Individual	Jam es	Gray			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1061-0001	Individual	Bo nnie	Gray		Yes	Who le Plan	Yes		Ye s				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N

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0329-0001	Organisation	Ben	Green	The Woodland Trust		ENV1		The Woodland Trust welcomes the opportunity to respond to the Castle Point Regulation 19 Draft Local Plan. As the UK's leading woodland conservation charity, our mission is to protect and restore ancient woodland, increase native tree cover, and inspire people to enjoy and value woods and trees. These priorities are rooted in tackling the twin crises of climate change and biodiversity loss, while creating healthier and more resilient places for people and wildlife. We commend Castle Point Borough Council for producing a Local Plan with clear ambitions to enhance biodiversity, strengthen green infrastructure, and address climate resilience.				However, to ensure that the Plan delivers genuine nature recovery and meets the challenges ahead, we recommend strengthening several policies to better protect irreplaceable habitats, deliver higher environmental gains, and embed long-term tree strategy objectives. This response sets out detailed comments on key policy areas, structured around Woodland Trust priorities. 1. Vision and Objectives The Plan's vision to make Castle Point the "green heart of South Essex" is laudable, particularly the ambition to deliver multifunctional green infrastructure, connected				A	We commend Castle Point Borough Council for producing a Local Plan with clear ambitions to enhance biodiversity, strengthen green infrastructure, and address climate resilience. However, to ensure that the Plan delivers genuine nature recovery and meets the challenges ahead, we recommend strengthening several policies to better protect irreplaceable habitats, deliver higher environmental gains, and embed long-term tree strategy objectives.	Noted	N

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												habitats, and climate-adapted development. Environmental objectives (Obj 2, Obj 3, Obj 4) set a strong foundation, but to ensure these are actionable we recommend: • Embedding measurable canopy cover and biodiversity indicators, aligned with our Tree Strategy Template's call for a seven per cent canopy increase over 16 years and a 30 per cent canopy cover target for all new developments. • Explicitly committing to bigger, better, and more joined-up habitats in line with the Lawton principles, referencing the Essex Local Nature Recovery Strategy								

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												(LNRS). • Introducing a specific objective to protect and restore ancient woodland and veteran trees. 2. Biodiversity Net Gain (Policy ENV3) Castle Point proposes a 10 per cent Biodiversity Net Gain (BNG) for brownfield sites and 20 per cent for greenfield sites. This is encouraging, but to maximise ecological benefit: The Woodland Trust calls for: 2 • A minimum of 20 per cent BNG across all sites, not just greenfield, to reflect emerging best practice and ensure consistent nature recovery. • 50 years' maintenance and monitoring of BNG sites, recognising the decades								

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												required for woodland habitats to mature. • Clear exclusion of ancient woodland and veteran trees from net gain calculations, in line with the Planners' Manual's recognition that loss of irreplaceable habitats always results in net biodiversity loss. We also support the use of the Urban Greening Factor (0.3 for major commercial and 0.4 for major residential schemes) but recommend expanding this into a Tree Equity Approach,1 ensuring greening efforts prioritise deprived and low-canopy areas, as outlined in the Tree Strategy Template. 3. Protection of Ancient									

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												Woodland and Veteran Trees (Policy ENV1 & ENV3) The Plan correctly identifies ancient woodland as an irreplaceable habitat and references NPPF protections. However, stronger policy wording is essential: The Woodland Trust calls for: • Explicit adoption of the recommended NPPF policy wording (paragraph 193, subsection c): "Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused unless there are wholly exceptional reasons". • Recognition that compensation									

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												cannot offset loss of ancient woodland or veteran trees. • Buffer zones: at least 50 metres for ancient woodland and 15x trunk diameter (or 5m beyond canopy) for veteran trees. • A proactive programme of Tree Preservation Orders (TPOs) for all ancient and veteran trees, and expansion of the Ancient Tree Inventory.2 4. Tree Strategy and Canopy Cover Castle Point's Plan recognises green infrastructure but lacks a comprehensive tree strategy. We recommend integrating a 16-year Tree and Woodland Action Plan, following our Tree Strategy Template: • 30 per cent canopy cover								

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												target for all new developments and 25 per cent canopy cover on council land by year 12. • Tree-lined streets as standard, in accordance with NPPF paragraph 136. • Mandatory use of UK and Ireland Sourced and Grown (UKISG)3 trees from appropriate seed zones. • Creation of local tree nurseries to strengthen biosecurity and provide local employment. • Adoption of Tree Equity Mapping to guide planting in deprived or low-canopy areas. 5. Hedgerows and Habitat Networks While hedgerows are noted in landscape policies, a dedicated hedgerow									

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												<p>policy is required to: 1 https://uk.treeequityscore.org/ 2 https://ati.woodlandtrust.org.uk/ 3 https://www.woodlandtrust.org.uk/about-us/what-we-do/we-plant-trees/uk-sourced-and-grown-scheme/ 3 • Recognise ancient hedgerows as irreplaceable features. • Apply a 10:1 replacement ratio for non-ancient hedgerow losses. • Require native, UKISG-compliant species for hedgerow planting and restoration. 6. Coastal, Landscape and Green Infrastructure Policies (ENV1 & ENV2) We support the Plan's ambition to protect Castle Point's distinctive landscapes</p>									

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												<p>and coastal habitats. To strengthen delivery:</p> <ul style="list-style-type: none"> • Embed woodland and hedgerow connectivity into landscape assessments. • Integrate ecological corridors into the proposed Riverside Strategy. • Require nature-based solutions (e.g., wet woodland creation, riparian buffers) for climate resilience. <p>7. Monitoring and Enforcement A robust monitoring framework is essential to ensure policies translate into outcomes. We recommend:</p> <ul style="list-style-type: none"> • Establishing a central database to track tree planting, canopy cover, and BNG delivery. • Annual public reporting on BNG 								

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												<p>compliance, canopy cover changes, and habitat connectivity. • Enforcement mechanisms for long-term stewardship of BNG and tree planting sites. Summary of Recommendations</p> <p>1. BNG: Minimum 20 per cent across all sites, with 50-year management.</p> <p>2. Canopy Cover: 30 per cent in new developments, 25 per cent on council land, with tree-lined streets.</p> <p>3. Ancient Woodland & Veteran Trees: Adopt NPPF 193c policy wording; apply buffer standards; expand TPOs and Ancient Tree Inventory.</p> <p>4. Tree Strategy: Implement a 16-year Tree and Woodland Action Plan with UKISG trees, local</p>													

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												nurseries, and equity mapping. 5. Hedgerows: Introduce a dedicated policy with strong protection and replacement standards. 6. Landscape & Coastal Policies: Strengthen ecological connectivity and nature-based climate solutions. 7. Monitoring: Establish centralised data, annual reporting, and enforcement mechanisms.								
0329002	Organisation	Ben	Green	The Woodland Trust		Vision & objectives											1. Vision and Objectives The Plan's vision to make Castle Point the "green heart of South Essex" is laudable, particularly the ambition to deliver multifunctional green infrastructure, connected habitats, and climate-adapted development. Environmental objectives (Obj 2, Obj 3, Obj 4) set a strong foundation, but to ensure these are actionable	It is considered that these matters are already covered indirectly or by other means. Policy ENV3(d)(iii) commits to 'An urban greening factor score of 0.3 for all major commercial development proposals and 0.4 for all major residential development	N	

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																	<p>we recommend:</p> <ul style="list-style-type: none"> • Embedding measurable canopy cover and biodiversity indicators, aligned with our Tree Strategy Template's call for a seven per cent canopy increase over 16 years and a 30 per cent canopy cover target for all new developments. • Explicitly committing to bigger, better, and more joined-up habitats in line with the Lawton principles, referencing the Essex Local Nature Recovery Strategy (LNRS). • Introducing a specific objective to protect and restore ancient woodland and veteran trees. 	<p>proposals, in line with the model Urban Greening Factor for England;</p> <p>Policy ENV3(c) commits to 'Conserving and <i>enhancing the network</i> of protected species, priority species or <i>priority habitats in accordance with their status</i> and give appropriate weight to their importance' (Italics our emphasis to indicate elements where the comment is covered)</p> <p>Commitments to the LRS are embedded throughout the plan and embedded in multiple policies, including ENV4, C1, C4, C6, C7, C8, C9, B1, B4, B7, B8, B9, Had1, Had2, Had 3, Thun 2, DH1, E1, ENV2)</p>	

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03290003	Organisation	Ben	Green	The Woodland Trust		ENV3											<p>2. Biodiversity Net Gain (Policy ENV3) Castle Point proposes a 10 per cent Biodiversity Net Gain (BNG) for brownfield sites and 20 per cent for greenfield sites. This is encouraging, but to maximise ecological benefit: The Woodland Trust calls for:</p> <ul style="list-style-type: none"> • A minimum of 20 per cent BNG across all sites, not just greenfield, to reflect emerging best practice and ensure consistent nature recovery. • 50 years' maintenance and monitoring of BNG sites, recognising the decades required for woodland habitats to mature. • Clear exclusion of ancient woodland and veteran trees from net gain calculations, in line with the Planners' Manual's recognition that loss of irreplaceable habitats always results in net biodiversity loss. <p>We also support the use of the Urban Greening Factor (0.3 for major commercial and 0.4 for major residential schemes) but recommend</p>	<p>Comments noted. Mods proposed in relation to Woodland Trust's third bullet.</p> <p>18:20 As set out in the NPPF, development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused unless there are wholly exceptional reasons. In line with the regulations, such irreplaceable habitats are also excluded from biodiversity net gain calculations since it is recognised that loss of irreplaceable habitats always results in net biodiversity loss. Biodiversity net gain should be subject to</p>	Y

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																	<p>expanding this into a Tree Equity Approach, ensuring greening efforts prioritise deprived and low-canopy areas, as outlined in the Tree Strategy Template.</p> <p>Also call for a programme of monitoring and enforcement.</p> <p>Protection of Ancient Woodland and Veteran Trees (Policy ENV1 & ENV3) The Plan correctly identifies ancient woodland as an irreplaceable habitat and references NPPF protections. However, stronger policy wording is essential: The Woodland Trust calls for:</p> <ul style="list-style-type: none"> • Explicit adoption of the recommended NPPF policy wording (paragraph 193, subsection c): “Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused unless there are wholly exceptional reasons”. • Recognition that compensation cannot 	maintenance and monitoring for at least 30 years.	

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																	<p>offset loss of ancient woodland or veteran trees.</p> <ul style="list-style-type: none"> • Buffer zones: at least 50 metres for ancient woodland and 15x trunk diameter (or 5m beyond canopy) for veteran trees. • A proactive programme of Tree Preservation Orders (TPOs) for all ancient and veteran trees, and expansion of the Ancient Tree Inventory. 		

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0329-0004	Organisation	Ben	Green	The Woodland Trust		ENV1											<p>Tree Strategy and Canopy Cover Castle Point's Plan recognises green infrastructure but lacks a comprehensive tree strategy. We recommend integrating a 16-year Tree and Woodland Action Plan, following our Tree Strategy Template:</p> <ul style="list-style-type: none"> • 30 per cent canopy cover target for all new developments and 25 per cent canopy cover on council land by year 12. • Tree-lined streets as standard, in accordance with NPPF paragraph 136. • Mandatory use of UK and Ireland Sourced and Grown (UKISG)3 trees from appropriate seed zones. • Creation of local tree nurseries to strengthen biosecurity and provide local employment. • Adoption of Tree Equity Mapping to guide planting in deprived or low-canopy areas. <p>Hedgerows and Habitat Networks While hedgerows are noted in landscape policies, a dedicated hedgerow policy is required to:</p>	<p>It should be noted that Policy D4(3) already requires new streets to be tree lined.</p> <p>Policy ENV3(d)(iii) commits to 'An urban greening factor score of 0.3 for all major commercial development proposals and 0.4 for all major residential development proposals, in line with the model Urban Greening Factor for England;'</p>	N

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																	<p>1 https://uk.treeequityscore.org/</p> <p>2 https://ati.woodlandtrust.org.uk/</p> <p>3 https://www.woodlandtrust.org.uk/about-us/what-we-do/we-plant-trees/uk-sourced-and-grown-scheme/</p> <p>3</p> <ul style="list-style-type: none"> • Recognise ancient hedgerows as irreplaceable features. • Apply a 10:1 replacement ratio for non-ancient hedgerow losses. • Require native, UKISG-compliant species for hedgerow planting and restoration. 		
0329-0005	Organisation	Ben	Green	The Woodland Trust		ENV2											<p>Coastal, Landscape and Green Infrastructure Policies (ENV1 & ENV2)</p> <p>We support the Plan's ambition to protect Castle Point's distinctive landscapes and coastal habitats. To strengthen delivery:</p> <ul style="list-style-type: none"> • Embed woodland and hedgerow connectivity into landscape assessments. • Integrate ecological corridors into the proposed Riverside Strategy. • Require nature-based solutions (e.g., wet 	Policy D4 Landscaping is explicit that trees, native species and integrated habitats are important. Policy ENV2 is clear that Development proposals must be designed to enable and support the habitat priority measures identified within the Strategic Opportunities	Y - Modification to Policy ENV1(2) Policy ENV1(2) Development proposals should seek to protect, and enhance and increase the connectiv

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																	woodland creation, riparian buffers) for climate resilience.	set out in the Essex Local Nature Recovery Strategy (LNRS). <u>Modification to Policy ENV1(2)</u> Policy ENV1(2) Development proposals should seek to protect, and enhance and increase the connectivity of key natural/ semi-natural and historical features including:	ity of key natural/ semi-natural and historical features including:
10930001	Individual	Michaela	Green		Yes	HAD4	No		No		No more flats! Over looking an infant school	No more flats overlooking children	No	Not Answered	Not Answered		Objecting to HAD4 because: No flats Overlooking School	"Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Close proximity to the school Chapter 16 - achieving well designed places	N

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																		will ensure that enough space is provided between the dwellings and the school playing field to safeguard school children and residents."	
11390001	Individual	Keneth	Green			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.				Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)	

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																	<p>Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led</p>	<p>Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.</p> <p><u>Consideration of All Sites</u></p> <p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p><u>North-West Thundersley</u></p> <p>Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p>	

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																		Green Belt/Grey Belt Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1139-0002	Individual	Kenneth	Green			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
11390003	Individual	Keneth	Green			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
11520001	Individual	Janette	Green			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.				Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines	Housing Supply – Government Housing Target and Standard method Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)	

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								no credible five-year housing land supply.			3316 urban homes for Canvey is not resident led						state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability	

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																		Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
115200	Individual	Janette	Green			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to	N

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02								Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.										the sites environment	
11520003	Individual	Janette	Green			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0090001	Individual	Sue	Greenway		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove	No		No	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure	

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.	Charfleets Industrial Estate site from the plan. Total housing target of 11,000.					based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDS: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
00900	Individual	Sue	Greenway		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/P ara No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a . So und?	3b. Positive/Effect ive/Justified/C onsistent?	3c. Explanation	4. Suggested modifications	5. Wis h to part icip ate in exam	6. Why ?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
002																		Infrastructure Delivery Plan (IDP).	
0091-0001	Individual	Corrine	Greenway		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate,	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDS: Policy	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
0091-0002	Individual	Corrine	Greenway		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
1077-0001	Individual	Veronica	Greenwood		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
011-0001	Individual	Tina	Gregory		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and	No		No	A	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes.	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the	Y - Policy SD3(3) 3. Proposals must demonstrate how

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								no credible five-year housing land supply.			justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led,.	sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with	reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDS: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options	the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	Canvey at 1050. Total housing target of 11,000.	have been considered through the SFRA.	
010100002	Individual	Tina	Gregory		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
01020001	Individual	Neil	Gregory		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led,.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No		No	A	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's

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																	sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDS: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
01020002	Individual	Neil	Gregory		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
13650001	Individual	Janet	Grimmer			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
13650002	Individual	Jan	Grimmer			SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			No five year housing land supply North West Thundersley should have been included Approach to Green/Grey Belt NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).	

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																		<p>common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West</p>	

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																		<p>Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by</p>	

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																		strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local	

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																		<p>highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to Canvey. SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS</p>	

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																		design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
13650003	Individual	Jane	Grimmer			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
13570001	Individual	Ian	Grimsey			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1357002	Individual	Ian	Grimsey			SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			No five year housing land supply North West Thundersley should have been included Approach to Green/Grey Belt NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).	

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																		<p>common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West</p>	

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																		<p>Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by</p>	

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																		strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local	

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																		<p>highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to Canvey. SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS</p>	

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																		design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
13570003	Individual	Ian	Grimsey			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
13750001	Individual	Rosemary	Grimsey			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/P ara No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a . So un d?	3b. Positive/Effect ive/Justified/C onsistent?	3c. Explanation	4. Suggested modifications	5. Wis h to part icip ate in exa m	6. Why ?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
1375002	Individual	Rosemary	Grimsey			SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			No five year housing land supply North West Thundersley should have been included Approach to Green/Grey Belt NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).	

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																		<p>common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West</p>	

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																		<p>Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by</p>	

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																		strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local	

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																		<p>highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to Canvey. SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS</p>	

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																		design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1375003	Individual	Rosemary	Grimsey			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0215001	Individual	Jac kie	Gros s		Yes	SP3	No	Dear Sir/Madam, I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The site selection strategy is biased and	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley	No		No		Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites.	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect

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											predetermined towards a 'no greenbelt build policy' The site selection is solely based on the 'over development of Brownfield sites'. The plan has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. The NPPF guidelines state development should be directed away from areas at highest risk of flooding. SuDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The proposed 3316 urban homes for Canvey is not resident led.	site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000					Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SUDS: Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
021	Individual	Jac kie	Gros s		Yes	C4	No	The proposed number of Canvey West homes puts residents to the	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at	Needs of emergency services	N

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5-0002								East at risk with emergency evacuation procedures.									risk with emergency evacuation procedures	considered in the supporting Infrastructure Delivery Plan (IDP).	
0927-0001	Individual	BEVERLEY	GROVES		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley	No	Justified, Consistent with national policy	Does not meet the housing target for castle point. ignores green belt/Grey belt against new NPPF guidelines the draft local plan is not justified. site selection strategy is biased and predetermined towards a "no green belt build policy. Site selection is based on the over development of Brownfield sites. Not considered all sites, no greenbelt/Greybelt sites added with the exclusion of North West thundersley. NPPF guidelines state developmennt should be directed away from areas of high risk of flooding. SUDS measures are not appropriate for Canvey Islands geography and drainage infrastuture. The 3316 urban homes for Canvey Island is not resident led. Canvey West homes puts residents in East at risk with Emergency evacuation procedures. Canvey is becoming more and more grid locked and an unpleasant place to live. there is no consideration for long term residents and the situation is becoming intolerable as it stands without additional projected number of housing that is proposed to be built. the infrastructure is poorly maintained and is not there for these proposed buildings and additional residents.	Add North West Thundersley stie 187A a Green belt/grey belt brownfield site option for 7500 homes . Reduce the urban housing target to 3500 from 6200 with canvey at 1050. Total housing target of 11,000	No	Not Answered	Not Answered	A	Doesn't meet housing targets Green/Grey Belt North West Thundersley Flooding on Canvey	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in	N

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																		<p>Castle Point.</p> <p>The Castle Point Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several</p>	

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																		clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey	

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																		<p>belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence.</p>	

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																		<p>Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Flooding on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and</p>	

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																		SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	

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0495-0001	Individual	David	Gubb		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped	N

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											evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.	Strategic alternatives North west	

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																		<p>Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p>Green/Grey Belt The Council has</p>	

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																		undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the	

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																		<p>impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergen</p>	

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																		<p>cyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation</p>	

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																		Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0495-0002	Individual	David	Gubb		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing	N

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																		<p>commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025).</p> <p>Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt.</p> <p>That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the</p>	

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																		Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.		
0495-0003	Individual	David	Gubb		Yes	Fore word					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.						A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N
0444-000	Individual	Ian	Gumery		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N	

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01																			
027-0001	Individual	Caroline	Gun n		Yes	Who le Plan	Yes	Dear Sir/Madam, I support the Castle Point Plan Regulation 19 Draft Consultation. I consider the draft plan to be legally compliant. I consider the draft plan to be sound.	Yes				Not Stat ed		No		Castle Point Plan is sound and legally compliant,	Support Noted	N
0938-0001	Individual	Joa nne	Guy ett		Yes	HAD 4	Yes		No	Positively prepared, Effective, Justified	Justified - The frontage of the development would not reflect the character of the area. Consideration should be given to the site - The North West Thundersley. 114 homes on this area of land (using the Castle Point Density and Capacity Study, and 100dph urban guide) would equate to six blocks of flats, four stories high. This is completely out of character for the area and would cause no end of traffic issues as well as GP surgeries and schools unable to cope. The local secondary school is already full and children are having to travel further afield for a school place. This over development policy will affect the highways and traffic and there is a lack of infrastructure, drainage and sewage in the urban area, therefore is not of effective soundness.	In order to be Justified, consideration of The North West Thundersley site should be considered as an alternative to this site. This would reduce the over development of urban sites.	No	Not Ans were d	Not Ans wer ed		Objects to HAD4 because: Density Traffic Infrastructure Allocate North West Thundersley instead	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details. Infrastructure Infrastructure matters (including	N

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																		<p>healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p>	

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12610001	Individual	Jean	Hagger			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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																		<p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u></p>	

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																		Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
12610002	Individual	Jean	Hagger			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
12	Individual	Jean	Hagger			C4					The number of Canvey West homes puts residents in the East						Development at West Canvey will impact	The safety of all Castle Point	N

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61-0003											at risk with emergency evacuation procedures.						emergency evacuation procedures for those residents living at East Canvey	residents is a priority and has been considered within the Castle Point Plan	
0201-0001	Individual	Lisa	Hagerty		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION : Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk

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																			Assessment (SFRA).
0200002	Individual	Lisa	Haggerty		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
03910001	Individual	Perry	Hall		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.						Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	<p>be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.</p>	<p>on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.</p> <p><u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.</p> <p><u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West</p>	

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																		<p>Thundersley was not preferred.</p> <p><u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p><u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments.</p> <p><u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.</p> <p><u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options</p>	

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																		have been considered through the SFRA.	
0391-0002	Individual	Perry	Hall		Yes	C4	No				The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0391-0003	Individual	Perry	Hall		Yes	C7	No	Failed to consider strategic alternatives like North West Thundersley. No Credible five-year housing land supply.	No	Justified, Consistent with national policy, Effective	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. LAKE DELIVERY FRAMEWORK:					Policy C7 Lacks clear delivery mechanisms and ongoing maintenance commitments No maintenance in 10 years despite the 6 point plan Agree with the vision for improving canvey lake Engage with friends of Canvey Lake	Comments noted. The purpose of Policy C7 is to improve the space as a multifunctional green space and include a long term management plan to ensure its upkeep is maintained. By requiring a management plan, it will ensure that the maintenance of	N

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											<p>highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. An unsound plan will put all Greenbelt sites at risk to speculative development.</p> <p>All; Greenbelt sites on Canvey West need total protection from government intervention.</p> <p>The policy is based on the total over development of urban sites, especially on Canvey.</p> <p>The 3316 urban homes for Canvey-is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. This over development policy for Canvey will affect highways and traffic, the lack of infrastructure, sewage and poor drainage system on Canvey, and enhance the flood risks to Canvey Lake. Policy C7 is not effective because it lacks clear delivery mechanisms and ongoing maintenance commitments.</p> <p>The 2015 Canvey Island 6 Point Plan recommended dredging, to increase lake capacity for flood storage - yet nearly 10 years later, these critical recommendations remain undelivered. Policy C7 repeats the same promises without addressing why previous commitments failed, providing concrete delivery timelines, funding sources, or ongoing maintenance schedules. I do agree with Policy C7's vision for improving Canvey Lake - delivering increased</p>	<p>Establish firm 2 year timeline for comprehensive lake dredging with dedicated funding and delivery agency.</p> <p>Create annual maintenance dredging schedule with long-term budget allocation. Set measurable targets for lake capacity increase and water quality improvements.</p> <p>Designate responsible agency for ongoing lake management with annual progress reporting and community consultation.</p> <p>COMMUNITY ENGAGEMENT: Engage with Friends of Canvey Lake, a community group, with 2.5k members championing the reset of Canvey Lake to its pre-2010 conditions, to</p>															

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											capacity through dredging for flood water storage, reducing flood risk, creating a long-term management plan, improving water quality, and enhancing habitat. Canvey Island suffers from high surface water flood risk, the lake serves as an important rainwater depository, and current poor water quality threatens users, animals and biodiversity. However, without concrete delivery mechanisms and learning from the 6 Point Plan's decade long delay, Policy C7 risks becoming another unfulfilled, promise while flood risks to Canvey Lake continue to increase.	ensure resident-led lake management improvements.								
0629-0001	Individual	Frank	Hall		Yes	Whole Plan	No		No				Not Answered	Not Answered	Not Answered		Castle Point Plan is not sound or legally compliant	Comment noted	N	
1178-0001	Individual	Kenneth	Hall			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target				Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build	Housing Supply – Government Housing Target and Standard method Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)		

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								Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the	

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																		<p>site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey</p>	

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																		SuDS options have been considered through the SFRA.	
11780002	Individual	Kenneth	Hall			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
11780003	Individual	Kenneth	Hall			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1070001	Individual	Kerry	Hallett		Yes	HAD4	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	The amount of local traffic this development will create is unreasonable and not sustainable. The area is already over populated and under serviced with local amenities. Traffic is already excessive between hadleigh and leigh on sea. The pollution created from this standing and constantly queueing traffic is unreasonable. Local services and doctors surgeries are over subscribed already. What was once a lovely place to live is being ruined by excessive building and a complete lack of additional local services to support this rapidly growing population.	Significant reduction in number of residences to be applied to this development.	No	Not Answered	Not Answered		Objecting to HAD4 because: Traffic Infrastructure Air quality	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Air Quality Air quality impacts are assessed in the Sustainability Appraisal, under objective 9.1. Annual Status Reports for Castle Point can be found on the Essex Air website along	N

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																		with further information relating to air quality within Castle Point. Castle Point monitor nitrogen dioxide using diffusion tubes at 30 monitoring locations around the district. The main source of pollution in the Borough is road traffic emissions from major roads, notably the A13, A127 and A130. The Council has not declared any Air Quality Management Areas (AQMAs). Generally, air pollution is low in Castle Point. Results from the monitoring points across the Borough suggest that air quality is improving.	
07630001	Individual	Angela	Hamilton		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0666	Individual	Mark	Hamlett		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/P ara No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a . So und?	3b. Positive/Effect ive/Justified/C onsistent?	3c. Explanation	4. Suggested modifications	5. Wis h to part icip ate in exa m	6. Why ?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
2-00001													were	were	were				
0560001	Individual	Frances	Hammond		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing	N

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											is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.								land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic	

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																		<p>paper.</p> <p>Strategic alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the</p>	

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																		<p>Sustainability Appraisal (SA).</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the</p>	

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																		<p>capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Emergency Evacuation The Councils detailed</p>	

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																		<p>emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/</p> <p>Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified</p>	

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																		through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
05600002	Individual	Frances	Hammond		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing	N

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																		<p>commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025).</p> <p>Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt.</p> <p>That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the</p>	

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																		Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0560003	Individual	Frances	Hammond		Yes	Foreword					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N

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0954-0001	Individual	Val	Hammond		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	<p>It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.</p> <p>It is not justified, the site selection strategy is biased and predetermined towards a "no greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the 3316 urban homes for Canvey is not resident led, the Canvey West homes puts residents in the East at risk with emergency evacuation procedures, and this over development policy for Canvey will affect highways and traffic, the lack of infrastructure, sewage and poor drainage system on Canvey, and enhance the flood risks to Canvey Lake.</p> <p>I do agree with Policy C7 about improving the Canvey Lake. This needs to deliver an increased capacity of the Lake from dredging for flood water storage, reduce the flood risk, a long-term management plan of the lake, improve and maintain water quality, enhancements to the</p>	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No	Not Answered	Not Answered	A	North West thundersley No five year housing land supply Not meeting housing target Green/Grey Belt Flood risk on canvey Infrastructure Support for Policy C7	<p>Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology.</p> <p>However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point.</p> <p>The Castle Point Plan Regulation 19 Draft makes</p>	N

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											<p>habitat surrounding the lake, an environment to create an attractive and functional area, and also identified as an area of particular importance for biodiversity within the Essex Local Nature Recovery Strategy.</p> <p>I concur with the many statements made within this policy, that Canvey Island suffers from high levels of surface water flood risk, and with higher rainfall Canvey Lake becomes an important depository for excess rainwater, poor water quality is unsafe for users, animals and biodiversity to thrive, we need to further improve this natural environment, and how surface water runoff contaminates should be managed, the Canvey Island 6 Point Plan was undertaken in 2015, about Canvey and recommended the capacity of the lake should be investigated and achieved through to provide additional storage capacity, and that Canvey Lake acts as a habitat to many different wildlife, including waterbirds and some aquatic life with the risks to wildlife due to the water quality. This is the vision we need for Canvey Lake.</p>												<p>provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025.</p> <p>Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan</p>	

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																		and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11	

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																		<p>onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport</p>	

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																		<p>evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle</p>	

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																		<p>Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out</p>	

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																		above. Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in	

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																		relation to Canvey. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Support for policy C7 noted.	

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12860001	Individual	John	Hammond			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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																		<p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u></p>	

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																		Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
12860002	Individual	John	Hammond			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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12860003	Individual	John	Hammond			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
13590001	Individual	Francis	Hammond			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
13590002	Individual	Francis	Hammond			SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			No five year housing land supply North West Thundersley should have been included Approach to Green/Grey Belt NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex	

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																		method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is	County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		<p>these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4)</p>	

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																		<p>outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing</p>	

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																		<p>flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Flooding Flood risk covered in</p>	

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																		policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to Canvey. SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
13590003	Individual	Francis	Hammond			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
10190001	Individual	Denise	Hamplatt		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
044	Individual	Sharon	Hampton		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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00001																			
0441-0001	Individual	Nick	Hampson		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0720-0001	Individual	Aimee	Harbison		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0164-0001	Individual	Paul	Harbord		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at	Not Stated		No	A	Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastruc

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											away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led The inclusion of the Charfleets Industrial estates as brownfield sites for development into mixed use housing and industrial areas has not fully considered the impact on micro, small, medium and large businesses currently operating on the estates that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor to zero engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estates. The future plans for Charfleets Industrial estates needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estates for housing, with business integrated with residential homes.	1050. Remove Charfleets Industrial Estate site from the plan. Remove Manor Trading Estate site from the plan. Total housing target of 11,000.					flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. Object for proposals for residential on Charfleets	alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDs design Guide for Essex. Canvey SuDs options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide	ture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		<i>and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'</i>	
01640002	Individual	Paul	Harbord		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
01640003	Individual	Paul	Harbord		Yes	B8	No	The B8 policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on Manor Trading Estate(MTE). This policy is not evidence based, but records show poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on the MTE. CPBC's vision is to create an environment	No	Not Stated			Not Stated		No	A	Policy B8 Manor Trading Estate The B8 policy is not evidence based, and officers have not engaged. CPBC's vision is to create an environment that promotes business on MTE, by removing 25% of its employment space for housing. This vision will mean MTE businesses will be forced to move to Canvey employment zones, as it has been previously suggested that any increase in commercial / industrial area could be accommodated on	Manor Trading Estate: Policy B8 part 6 states 'A programme of renewal of the industrial and commercial building stock within the estate with the overall aim of an increase in floor space of at least 10%' Paragraph 9.28 states ' It is not the intention of the Master Plan to result in a loss of employment on this site. Overall, the	N

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								that promotes business on MTE, by removing 25% of its employment space for housing. This vision will mean MTE businesses will be forced to move to Canvey employment zones, as it has been previously suggested that any increase in commercial / industrial area could be accommodated on Canvey. ECC will relay objections in that any residential units near protected facilities will undoubtedly increase noise complaints. CPBC's Officers Mapping of the MTE is incorrect and misleads the public, as MTE is a max of 12.5 Ha and not the 14 Ha stated, as it does not include the properties which all front Church Road. The MTE Road & footways network is privately owned, so who will fund the new roads, footways and cycle paths across private land. The future plans for Manor Trading Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Manor Trading Industrial estate for housing, with business									Canvey. ECC will relay objections in that any residential units near protected facilities will undoubtedly increase noise complaints. CPBC's Officers Mapping of the MTE is incorrect and misleads the public, as MTE is a max of 12.5 Ha and not the 14 Ha stated, as it does not include the properties which all front Church Road. The MTE Road & footways network is privately owned, so who will fund the new roads, footways and cycle paths across private land. The future plans for Manor Trading Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Manor Trading Industrial estate for housing, with business integrated with residential homes.	Master Plan should seek a modest increase in the floor space available for industrial and commercial uses to support economic growth. This will be secured through the revised approach to design and parking.'	

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								integrated with residential homes.											
0397-0001	Individual	John	Harding		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do not totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, puts the Hadleigh farmland site at risk to speculative development, with	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No			A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to	N

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											respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.								deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's	

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																		Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's	

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																		<p>aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons</p>	

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																		<p>set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the</p>	

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																		<p>value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does</p>	

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sounded?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																		not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
1011-0001	Individual	Laurel	Harding		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point and the site selection ignores Greenbelt/Greybelt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt/Greybelt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, puts the Hadleigh farmland site at risk to speculative development, needing planning objections with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage,	Add North West Thundersley site, 187 Ha, as a Greenbelt, Greybelt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered		Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes	N

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											<p>archaeology, promoting historic links and use Greybelt first. Any development on this site affects both Hadleigh and the neighbouring area of Leigh-on-Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site and I hope the Salvation Army agree with this direction.</p> <p>We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh-on-Sea.</p>										<p>provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025.</p> <p>Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan</p>	

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																		and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11	

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																		<p>onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport</p>	

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																		<p>evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle</p>	

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																		<p>Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out</p>	

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																		above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	
1371-0001	Individual	Barbara	Harmer			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1371002	Individual	Barbara	Harmer			SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			No five year housing land supply North West Thundersley should have been included Approach to Green/Grey Belt NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).	

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																		<p>common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West</p>	

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																		<p>Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by</p>	

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																		strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local	

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																		<p>highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to Canvey. SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS</p>	

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																		design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
13710003	Individual	Barbara	Harmer			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
01370001	Individual	Gillian	Harper		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and	PROPOSED MODIFICATION : Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect

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								Thundersley. It has no credible five-year housing land supply.			predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
01370002	Individual	Gilligan	Harper		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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00270001	Individual	Rebecca	Harri		Yes	SP3	No	As the Member of Parliament for Castle Point, I have always stood firmly alongside local residents in defending the character, integrity, and resilience of our Borough. The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known, and in parts of Benfleet and Hadleigh, where drainage infrastructure is under strain. Also, significantly there are effectively only three highways access routes in and out of the	No	Positive, Effective, Justified, Consistent	Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest. Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan	In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough.	Not Stated		No	<p>Objections on:</p> <ul style="list-style-type: none"> • 5 Year housing supply - Not identified as required under NPPF 78. • Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution. • SA - NW Thundersley not adequately assessed. • Biodiversity - No enforceable delivery mechanisms or implementation pathways to address NPPF 180. Mitigation measure identified but theoretical rather than practical. 	<ul style="list-style-type: none"> • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year 	N	

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								Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, for reasons I will detail later in this response, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location,			does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be	The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability.						housing land supply.	

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								without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I would also like it to be acknowledged that, although the Council's approach to engagement has been broadly constructive and the consultations on the Plan well-advertised, many residents have found the Regulation 19 consultation difficult to engage with due to its length and complexity. It is vital that, where possible, this is made more accessible for residents, so that all voices in our community can be heard and understood. Hence why, although I have attempted to answer all the questions in the			clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater	Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth. I also encourage the Council to release a more accessible version of the consultation. Many residents have found the Regulation 19 process difficult to engage with due to its length and complexity. A more user-friendly approach would help ensure that all voices are heard. I urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate. With the right adjustments,									

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								consultation, I would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental and infrastructure constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan			levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic	this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough.									

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								lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination.			housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island’s geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council’s commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey’s unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access										

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											<p>point to Canvey because of its unique geography remains a strategic weakness. It is deeply regrettable that the Council abandoned work on the 'Canvey Third Access Task Force' in 2022. Had this work continued, a viable solution could have been identified and included within the Plan period. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year</p>													

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											<p>supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley</p>													

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											represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site. The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic												

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											<p>growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary,</p>													

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											<p>their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic</p>													

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											<p>release that the NPPF envisages - one that protects more sensitive areas by concentrating growth where it can be properly supported. For several decades now residents across Castle Point have fought tirelessly to protect our Green Belt from inappropriate development. Time and again local people have stood together to defend fields, woodlands and open spaces that give our Borough its unique character and identity. These battles have often been long and difficult, but our communities have prevailed because the case for preservation has always been strong. The Government's so-called "Grey Belt" is intended to capture parcels of Green Belt land that are derelict, fragmented, or of genuinely low environmental and amenity value. It was never meant to include land that is open, valued by communities, or performing the very purposes that the Green Belt is meant to serve. There is no doubt that if the Council's draft plan is found unsound, which I believe because of the reasons outlined in my previous submission there is a very serious risk that it will be, the Inspector will direct the Council to look at what they have identified as 'Grey Belt' sites for development to attempt to better meet local housing targets. I fear that by classifying large areas of Castle Point as "Grey Belt" the Council are inviting the Planning Inspector to do the very thing residents have fought against for</p>													

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											<p>decades, release treasured Green Belt for development by mislabelling it as expendable. For that reason I set out below a site-by-site rebuttal to the Council's classifications, explaining clearly why these parcels should not be treated as Grey Belt and why each continues to merit Green Belt protection.</p> <p>West of Canvey Road (GB1) The Council claim the parcel lies adjacent to the urban edge and therefore makes a weaker contribution to openness¹. West of Canvey Road is essential to the integrity of Canvey Island's landscape. Far from being derelict, it provides a critical buffer between residential areas and hazardous COMAH-designated industrial sites. The land also performs a floodplain function in a borough where surface water and tidal flooding are already major concerns. Its open aspect gives relief from urban intensity and provides resilience against climate challenges. Reclassifying such a strategically important piece of land as Grey Belt is wholly inappropriate and contrary to the NPPF's requirement to safeguard land from encroachment².</p> <p>East of Canvey Road (GB2) The Council's justification for classing it as 'Grey Belt' land seems to be is that it is adjacent to existing built area was and previously considered for development, therefore seen as lower value¹. This parcel is wrongly characterised. East of Canvey Road provides</p>													

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											<p>separation between industrial uses and residential communities. Its open nature prevents ribbon development along this strategic road and offers necessary land for drainage and flood resilience. Canvey is already over-allocated with housing in this draft plan, to designate such land as Grey Belt ignores the island's unique vulnerability and the strong evidence from Essex County Council's Section 19 Flood Report³. Land South of Charfleets (GB3)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be the proximity to Charfleets industrial estate and perception of reduced "connectivity"¹.</p> <p>Land South of Charfleets forms a vital open break preventing sprawl from overwhelming this industrial area. Its greenery offsets industrial activity, provides amenity value and performs drainage functions. To downgrade it because of industrial adjacency is to misunderstand Green Belt policy, the NPPF explicitly highlights safeguarding the countryside from encroachment as a key purpose².</p> <p>Land off Glebelands (GB4)</p>									

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											<p>The Council's justification for classing it as 'Grey Belt' land seems to be that this is one of the small peripheral parcels of Green Belt land that make less of a contribution to strategic openness¹.</p> <p>Glebelands is a green wedge that separates built form and protects the rural character of its surroundings. It is valued by residents for informal recreation and ecological richness. Parcel size is irrelevant, the NPPF sets no minimum thresholds and many small Green Belt sites perform critical local functions. To mark this as Grey Belt is to apply arbitrary tests not supported by national policy. I stood shoulder to shoulder with residents to fight previous attempts to develop part of this site at planning appeal stage. I am disappointed that those victories could be rendered meaningless by now designating it 'Grey Belt'.</p> <p>West of Benfleet (Jotmans) (GB5)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be based on somewhat fragmented ownership of the whole site (although large parts are in single ownership) and adjacency to existing residential development¹.</p> <p>The Jotmans fields are one of the</p>													

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											<p>most important open landscapes in Castle Point. They prevent coalescence between Benfleet and surrounding areas, retain visual openness and support biodiversity corridors. Fragmented ownership does not diminish value, indeed it may reduce development pressure. Residents have repeatedly resisted speculative schemes here, demonstrating it's continued community importance. Just as with Glebelands, I stood shoulder to shoulder with residents to fight previous attempts to develop part of this site at planning appeal stage and then the High Court. I am disappointed that those victories could be rendered meaningless by now designating it 'Grey Belt'.</p> <p>Land between Felstead Road and Catherine Road (GB6)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that its irregular shape and limited access diminish its strategic contribution¹.</p> <p>Shape and access are not tests of Green Belt worth. This parcel prevents outward sprawl from nearby roads and maintains openness in a heavily developed part of the Borough. It also supports biodiversity and drainage in an area prone to</p>											

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											<p>surface water flooding. To mark it as Grey Belt is to ignore its real-world function.</p> <p>The Chase (GB12)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it is adjacent to residential development and the fact that has been assessed as having a lower contribution to the functions of Green Belt in SLAA¹.</p> <p>The Chase is an important open space separating built form and providing amenity value. It preserves the pattern of settlement and is highly visible to local residents. To release this parcel would set a precedent for creeping infill that undermines the wider Green Belt.</p> <p>East of Rayleigh Road (GB13)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it is on the edge of the current settlement boundary and, previously promoted for development¹.</p> <p>This land provides the rural setting of Rayleigh Road, preventing the blurring of urban boundaries. It supports</p>									

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											<p>biodiversity and acts as an accessible green corridor. Past promotion for development does not negate its current Green Belt functions. I stood with residents and the Council to fight against and win an appeal to prevent development on this site only last year. That victory should not be rendered meaningless by it being classified as 'Grey Belt' now.</p> <p>North of Grasmere Road (GB15)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it is a promoted site in SLAA and that is adjacent to and area of high housing noted¹.</p> <p>These open fields prevent sprawl and retain a strong settlement boundary. They also provide informal recreation for nearby residents and support biodiversity. To call this Grey Belt is to undervalue the clear openness and function it provides.</p> <p>East of Manor Trading Estate (NR3)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that the adjacent</p>											

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											<p>trading estate diminishes openness¹.</p> <p>This parcel is a buffer between employment and housing, mitigating noise and pollution. It safeguards residents' quality of life while preventing encroachment. Its role as a barrier to industrial creep is precisely the kind of function the Green Belt is meant to serve.</p> <p>Land North of Thundersley Church Road & East of Downer Road North (GB19)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it is on the edge of the current settlement and land promoted through the call for sites¹.</p> <p>This land forms a distinct wedge of open countryside that prevents coalescence, supports biodiversity and protects Thundersley's semi-rural setting. Its importance is recognised by residents who have fought repeated attempts to develop it.</p> <p>Land to the rear of 329 Benfleet Road (GB23)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to that it is a small parcel promoted in call for sites¹.</p>												

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											<p>Small parcels often have high value. This one prevents ribbon development and protects neighbour amenity. It should not be downgraded merely for its size.</p> <p>Land off Shipwrights Close (GB24)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it is a 'gap' site adjacent to housing¹.</p> <p>This parcel prevents settlement creep and maintains green relief for residents. Loss would encourage incremental erosion of the Green Belt.</p> <p>Land between Glen Haven and Ye Oaks, Bassenthwaite Road (GB26)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it is on the edge of a plot promoted for development¹.</p> <p>This site maintains the clear transition from settlement to countryside. Its openness is important locally. Downgrading it risks creeping coalescence.</p>													

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											<p>Land Adjacent 298 Church Road (GB27)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it was identified as a small parcel available for development in call for sites¹.</p> <p>This land contributes to the green setting of Church Road. Small parcels can be disproportionately important to character.</p> <p>Land off Glyders (GB31)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it is an edge-of-settlement parcel¹.</p> <p>Glyders prevents sprawl and supports biodiversity. Its downgrade is unjustified. I also believe this was also not a site featured in the regulation 18 consultation as a possible Green Belt development site. It would be unfair to local residents to consider it 'Grey Belt' out of the blue now.</p> <p>Grandview Stables, Grandview Road (GB34)</p> <p>The Council's justification for</p>									

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											<p>classing it as 'Grey Belt' land seems to be that Green Belt used for equestrian purposes can be seen as less open and accessible and therefore make a lower contribution to the functions of Green Belt¹ Grandview Stables is a classic rural land use. It preserves openness and supports recreation. It should not be downgraded. The Council's classification of these parcels as "Grey Belt" is unjustified and dangerous. None of the sites above meet the Government's suggested criteria for such a label, they are not derelict, they are not redundant, and they are not expendable. Each makes a clear and demonstrable contribution to the Green Belt purposes set out in the NPPF. By applying the "Grey Belt" label the Council are not protecting the Green Belt but putting it at risk. Should the Plan be found unsound, these will be the first sites the Inspector turns to. That is why I urge the Council to review their classifications and to give the residents who live around each site the explicit opportunity to argue against the label before the examiners are invited to reassign their fate. Most importantly, I reiterate that the Borough's housing needs cannot and should not be met by sacrificing these vital sites. A better and more balanced alternative, infrastructure-led growth at the appropriate location, namely North West Thundersley (the Blinking Owl site), is available and would protect the Borough's most</p>												

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											treasured open spaces while also giving the Plan a realistic prospect of being found sound. I think it is profoundly wrong dishonest to not classify all or if not significantly more of the site as 'Grey Belt' when it features far more derelict, underused and plotland sites that provide little or no amenity to local residents. I urge the Council to further consult with local residents specifically around 'Grey Belt' sites who many not be aware of the significance of the label and the implications of it if the Council's plan is found flawed and unsound by the Inspector.										
0027-0002	Individual	Rebecca	Harris		Yes	Forward	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its	No	Not Stated			Not Stated		No		<ul style="list-style-type: none"> Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution. 	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N		

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								expectation that Statements of Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
01840001	Individual	Deby	Harri		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The	PROPOSED MODIFICATION : Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDs design Guide for Essex. Canvey	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex

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											3,316+ urban homes for Canvey is not resident led.						The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	SuDS options have been considered through the SFRA.	County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
01840002	Individual	Deby	Harri		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0300001	Individual	Rebecca	Harri s		Yes	SP3	No	Dear Castle Point Borough Council, Please accept the following as my response to the Regulation 19 consultation on the Castle Point Draft New Local Plan. As the Member of Parliament for Castle Point, I have always stood firmly alongside local residents in defending the character, integrity, and resilience of our Borough. The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known, and in	No	Positive,Effective,Justified,Consistent	Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land	Not Stated		No		<u>Green Belt</u> Welcomes the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. <u>North West Thundersley</u> That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a	Recognition of strong community engagement noted. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Duty to Cooperate</u> Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. <u>Housing Supply</u> Housing Supply:	N

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								parts of Benfleet and Hadleigh, where drainage infrastructure is under strain. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, for reasons I will detail later in this response, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or			discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley	supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth. I also encourage the Council to release a more accessible version of the consultation. Many residents have found the Regulation 19 process difficult to engage with due to its length and complexity. A more user-friendly approach would help ensure that all voices are heard. I urge				pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. NW Thundersley not adequately assessed in the SA. <u>Duty to Cooperate:</u> Fails legal duty. Paragraph 28 of the NPPF is explicit in its	See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Biodiversity Policies</u> ENV1 to ENV6 set out the Council's approach to protect existing assets, and mitigate impacts including via Biodiversity Net Gain, LNRS and design features. The protection biodiversity features is reinforced via consideration these factors in reality to site options in the SA and SLAA; and also the mitigation of impacts upon international sites via the HRA process.		

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								colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I would also like it to be acknowledged that, although the Council's approach to engagement has been broadly constructive and the consultations on the Plan well-advertised, many residents have found the Regulation 19 consultation difficult to engage with due to its length and complexity. It is vital that, where possible, this is made more accessible for			as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. It is deeply regrettable that the Council abandoned work on the 'Canvey Third Access Task Force' in 2022. Had this work continued, a viable solution could have been identified and included within the Plan period. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and	Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.				expectation that Statements of Common Ground should be used to evidence this cooperation. <u>Five Year Housing Supply</u> The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. <u>Biodiversity</u> The Plan's approach to biodiversity and environmental protection also requires strengthening. Paragraph 180 of the NPPF makes clear that development should not proceed where it would result in significant harm to biodiversity or protected sites unless that harm can be fully mitigated. While the draft Plan identifies a range of mitigation measures, it does not yet provide enforceable delivery mechanisms. Without clear implementation pathways, these measures risk remaining theoretical rather than practical.			

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								residents, so that all voices in our community can be heard and understood. Hence why, although I have attempted to answer all the questions in the consultation, I would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental and infrastructure constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location			Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green										

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								for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality			Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is										

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								but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone. The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been			demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglan Interchange upgrade, in										

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								adequately assessed. The Plan's approach to biodiversity and environmental protection also requires strengthening. Paragraph 180 of the NPPF makes clear that development should not proceed where it would result in significant harm to biodiversity or protected sites unless that harm can be fully mitigated. While the draft Plan identifies a range of mitigation measures, it does not yet provide enforceable delivery mechanisms. Without clear implementation pathways, these measures risk remaining theoretical rather than practical. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the			partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24-28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not										

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								Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest. Soundness of the Plan To be found sound at			through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages - one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and											

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								<p>examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every</p>			<p>future residents of our Borough. Kind regards, Rebecca Dame Rebecca Harris MP Member of Parliament for Castle Point</p>										

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								<p>viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed</p>												

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								for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability.											

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0300002	Individual	Rebecca	Harri		Yes	SP3	No				<p>West of Canvey Road (GB1) The Council claim the parcel lies adjacent to the urban edge and therefore makes a weaker contribution to openness¹.</p> <p>West of Canvey Road is essential to the integrity of Canvey Island's landscape. Far from being derelict, it provides a critical buffer between residential areas and hazardous COMAH-designated industrial sites. The land also performs a floodplain function in a borough where surface water and tidal flooding are already major concerns. Its open aspect gives relief from urban intensity and provides resilience against climate challenges. Reclassifying such a strategically important piece of land as Grey Belt is wholly inappropriate and contrary to the NPPF's requirement to safeguard land from encroachment².</p> <p>1 = Housing Capacity Topic Paper (August 2025), pp.39-46. Table 13.10: list of Grey Belt parcels and commentary. "Land adjacent to settlement edge with reduced openness..." (p.40). "Fragmented ownership reduces contribution to Green Belt purposes." (p.41). "Equestrian land considered less open." (p.44).</p> <p>2 = National Planning Policy Framework (Dec 2024) Para 138: Green Belt serves five purposes including preventing sprawl and safeguarding countryside.</p>		Not Stated		No		<p><u>Canvey Allocation</u> The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental and infrastructure constraints. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. <u>Flood Risk and SuDs, particularly on Canvey</u> Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely</p>	<p><u>Canvey</u> All reasonable option sites, including on Canvey and elsewhere, were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Flood Risk and Infrastructure</u> Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDS</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex <u>and the Castle Point Strategic Flood Risk Assessment (SFRA).</u> The plan has been subject to</p>	<p>Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex</p>

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											Para 143: Green Belt boundaries should only be altered in exceptional circumstances. Para 147: Inappropriate development is harmful and should not be approved except in very special circumstances.						deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and	detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan	

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																	<p>maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints</p> <p><u>Canvey Access Issues</u></p> <p>The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. It is deeply regrettable that the Council abandoned work on the 'Canvey Third Access Task Force' in 2022. Had this work continued, a viable solution could have been identified and included within the Plan period.</p>		

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0300003	Individual	Rebecca	Harri		Yes	SP3	Not Stated		No	Not stated	<p>East of Canvey Road (GB3) The Council's justification for classing it as 'Grey Belt' land seems to be is that it is adjacent to existing built area was and previously considered for development, therefore seen as lower value¹.</p> <p>This parcel is wrongly characterised. East of Canvey Road provides separation between industrial uses and residential communities. Its open nature prevents ribbon development along this strategic road and offers necessary land for drainage and flood resilience. Canvey is already over-allocated with housing in this draft plan, to designate such land as Grey Belt ignores the island's unique vulnerability and the strong evidence from Essex County Council's Section 19 Flood Report³.</p> <p>1 = Housing Capacity Topic Paper (August 2025), pp.39-46. Table 13.10: list of Grey Belt parcels and commentary. "Land adjacent to settlement edge with reduced openness..." (p.40). "Fragmented ownership reduces contribution to Green Belt purposes." (p.41). "Equestrian land considered less open." (p.44).</p> <p>3 = Section 19 Flood Investigation Report – Castle Point (Essex County Council, 2022) "Surface water flooding across Canvey Island demonstrates the severe limitations of drainage</p>		Not Stated		No		Objects to categorisation of GB3 as Grey belt	Noted.	N

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											infrastructure.” (p.12). “Increased impermeable surfaces will exacerbate flood risk.” (p.23).”									

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0300004	Individual	Rebecca	Harri s		Yes	SP3	No		No	Not stated	<p>Land South of Charfleets (GB3)</p> <p>The Council’s justification for classing it as ‘Grey Belt’ land seems to be the proximity to Charfleets industrial estate and perception of reduced “connectivity”¹.</p> <p>Land South of Charfleets forms a vital open break preventing sprawl from overwhelming this industrial area. Its greenery offsets industrial activity, provides amenity value and performs drainage functions. To downgrade it because of industrial adjacency is to misunderstand Green Belt policy, the NPPF explicitly highlights safeguarding the countryside from encroachment as a key purpose².</p> <p>A better and more balanced alternative, infrastructure-led growth at the appropriate location, namely North West Thundersley (the Blinking Owl site), is available and would protect the Borough’s most treasured open spaces while also giving the Plan a realistic prospect of being found sound. I think it is profoundly wrong and dishonest to not classify all or if not significantly more of the site as ‘Grey Belt’ when it features far more derelict, underused and plotland sites that provide little or no amenity to local residents.</p> <p>1 = Housing Capacity Topic Paper (August 2025), pp.39–46. Table 13.10: list of Grey Belt parcels and commentary. “Land adjacent to settlement edge with reduced openness...” (p.40). “Fragmented ownership reduces</p>		Not Stated		No		Objects to categorisation of GB27, GB31 and GB34 as Grey belt	Noted.	N

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											<p>contribution to Green Belt purposes.” (p.41). “Equestrian land considered less open.” (p.44).</p> <p>2 = National Planning Policy Framework (Dec 2024) Para 138: Green Belt serves five purposes including preventing sprawl and safeguarding countryside. Para 143: Green Belt boundaries should only be altered in exceptional circumstances. Para 147: Inappropriate development is harmful and should not be approved except in very special circumstances. West of Benfleet (Jotmans) (GB5) The Council’s justification for classing it as ‘Grey Belt’ land seems to be based on somewhat fragmented ownership of the whole site (although large parts are in single ownership) and adjacency to existing residential development¹. The Jotmans fields are one of the most important open landscapes in Castle Point. They prevent coalescence between Benfleet and surrounding areas, retain visual openness and support biodiversity corridors. Fragmented ownership does not diminish value, indeed it may reduce development pressure. Residents have repeatedly resisted speculative schemes here, demonstrating it’s continued community importance. Just as with Glebelands, I stood shoulder to shoulder with residents to fight previous attempts to develop part of this site at planning</p>												

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											<p>appeal stage and then the High Court. I am disappointed that those victories could be rendered meaningless by now designating it 'Grey Belt'.</p> <p>Land between Felstead Road and Catherine Road (GB6) The Council's justification for classing it as 'Grey Belt' land seems to be that its irregular shape and limited access diminish its strategic contribution¹. Shape and access are not tests of Green Belt worth. This parcel prevents outward sprawl from nearby roads and maintains openness in a heavily developed part of the Borough. It also supports biodiversity and drainage in an area prone to surface water flooding. To mark it as Grey Belt is to ignore its real-world function.</p> <p>The Chase (GB12) The Council's justification for classing it as 'Grey Belt' land seems to be that it is adjacent to residential development and the fact that has been assessed as having a lower contribution to the functions of Green Belt in SLAA¹. The Chase is an important open space separating built form and providing amenity value. It preserves the pattern of settlement and is highly visible to local residents. To release this parcel would set a precedent for creeping infill that undermines the wider Green Belt.</p> <p>East of Rayleigh Road (GB13) The Council's justification for</p>													

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											<p>classing it as 'Grey Belt' land seems to be that it is on the edge of the current settlement boundary and, previously promoted for development¹.</p> <p>This land provides the rural setting of Rayleigh Road, preventing the blurring of urban boundaries. It supports biodiversity and acts as an accessible green corridor. Past promotion for development does not negate its current Green Belt functions. I stood with residents and the Council to fight against and win an appeal to prevent development on this site only last year. That victory should not be rendered meaningless by it being classified as 'Grey Belt' now.</p> <p>North of Grasmere Road (GB15)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it is a promoted site in SLAA and that is adjacent to and area of high housing noted¹.</p> <p>These open fields prevent sprawl and retain a strong settlement boundary. They also provide informal recreation for nearby residents and support biodiversity. To call this Grey Belt is to undervalue the clear openness and function it provides.</p>									

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											<p>East of Manor Trading Estate (NR3)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that the adjacent trading estate diminishes openness¹.</p> <p>This parcel is a buffer between employment and housing, mitigating noise and pollution. It safeguards residents' quality of life while preventing encroachment. Its role as a barrier to industrial creep is precisely the kind of function the Green Belt is meant to serve.</p> <p>Land North of Thundersley Church Road & East of Downer Road North (GB19)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it is on the edge of the current settlement and land promoted through the call for sites¹.</p> <p>This land forms a distinct wedge of open countryside that prevents coalescence, supports biodiversity and protects Thundersley's semi-rural setting. Its importance is recognised by residents who have fought repeated attempts to develop it.</p>										

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											<p>Land to the rear of 329 Benfleet Road (GB23)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it is a small parcel promoted in call for sites¹.</p> <p>Small parcels often have high value. This one prevents ribbon development and protects neighbour amenity. It should not be downgraded merely for its size.</p> <p>Land off Shipwrights Close (GB24)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it is a 'gap' site adjacent to housing¹.</p> <p>This parcel prevents settlement creep and maintains green relief for residents. Loss would encourage incremental erosion of the Green Belt.</p> <p>Land between Glen Haven and Ye Oaks, Bassenthwaite Road (GB26)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it is on the edge of a plot promoted for development¹.</p>									

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											<p>This site maintains the clear transition from settlement to countryside. Its openness is important locally. Downgrading it risks creeping coalescence.</p> <p>Land Adjacent 298 Church Road (GB27)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it was identified as a small parcel available for development in call for sites¹.</p> <p>This land contributes to the green setting of Church Road. Small parcels can be disproportionately important to character.</p> <p>Land off Glyders (GB31)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that it is an edge-of-settlement parcel¹.</p> <p>Glyders prevents sprawl and supports biodiversity. Its downgrade is unjustified. I also believe this was also not a site featured in the regulation 18 consultation as a possible Green Belt development site. It would be unfair to local residents to consider it 'Grey Belt' out of the</p>									

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											<p>blue now.</p> <p>Grandview Stables, Grandview Road (GB34)</p> <p>The Council's justification for classing it as 'Grey Belt' land seems to be that Green Belt used for equestrian purposes can be seen as less open and accessible and therefore make a lower contribution to the functions of Green Belt¹.</p> <p>Grandview Stables is a classic rural land use. It preserves openness and supports recreation. It should not be downgraded.</p> <p>The Council's classification of these parcels as "Grey Belt" is unjustified and dangerous. None of the sites above meet the Government's suggested criteria for such a label, they are not derelict, they are not redundant, and they are not expendable. Each makes a clear and demonstrable contribution to the Green Belt purposes set out in the NPPF.</p> <p>By applying the "Grey Belt" label the Council are not protecting the Green Belt but putting it at risk. Should the Plan be found unsound, these will be the first sites the Inspector turns to. That</p>									

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											<p>is why I urge the Council to review their classifications and to give the residents who live around each site the explicit opportunity to argue against the label before the examiners are invited to reassign their fate.</p> <p>Most importantly, I reiterate that the Borough's housing needs cannot and should not be met by sacrificing these vital sites. A better and more balanced alternative, infrastructure-led growth at the appropriate location, namely North West Thundersley (the Blinking Owl site), is available and would protect the Borough's most treasured open spaces while also giving the Plan a realistic prospect of being found sound. I think it is profoundly wrong dishonest to not classify all or if not significantly more of the site as 'Grey Belt' when it features far more derelict, underused and plotland sites that provide little or no amenity to local residents.</p> <p>I urge the Council to further consult with local residents specifically around 'Grey Belt' sites who many not be aware of the significance of the label and the implications of it if the Council's plan is found flawed and unsound by the Inspector.</p>									

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1240001	Individual	Angela	Harri			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.				Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)	

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																		<p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u></p>		

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																		Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1240002	Individual	Angela	Harri			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
12	Individual	Angela	Harri			C4					The number of Canvey West homes puts residents in the East						Development at West Canvey will impact	The safety of all Castle Point	N

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400003											at risk with emergency evacuation procedures.						emergency evacuation procedures for those residents living at East Canvey	residents is a priority and has been considered within the Castle Point Plan	
01200001	Individual	Barbara	Harrison		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION : Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk

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																			Assessm ent (SFRA).	
0120002	Individual	Barbara	Harrison		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N	
0218001	Individual	Simon	Hart		Not Stated	SP3	Not Stated		No	Not Stated	Dear Inspector of the Castle Point Plan, I have been a resident of Castle Point for [Redacted Personal Information], and a former Cllr of Castle Point, who has been involved in previous local plans and the very early stages of this plan. I would like to submit a brief opinion on this plan. First of all, the housing target for Castle Point is too high. This is not a NIMBY comment but one of simple fact, due to its topography, location, and highway structure. Any development in Southend, Rochford, and Rayleigh has to come through the Castle Point entry and exit points and on to Basildon. The current Castle Point Plan of over 6,000 homes within the urban areas will destroy the area completely, using most of the open areas, massively overdeveloping the urban areas, and increasing the housing density to an unacceptable level. The internal highway structure of Castle Point is generally at near capacity and massively at over capacity at peak times without this planned expansion. When I was involved		Not Stated		No			The housing target for Castle Point is too high. This is not a NIMBY comment but one of simple fact, due to its topography, location, and highway structure. Any development in Southend, Rochford, and Rayleigh has to come through the Castle Point entry and exit points and on to Basildon. The current Castle Point Plan of over 6,000 homes within the urban areas will destroy the area completely, using most of the open areas, massively overdeveloping the urban areas, and increasing the housing density to an unacceptable level. The internal highway structure of Castle Point is generally at near capacity and massively at over capacity at peak times	Comments noted. Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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											in this plan, I seem to recall the urban area development capacity was estimated to be over 1,000, and a maximum including car parks , supermarkets, etc., was 3,000, and at that time, I raised concerns that maximising urban development would destroy Castle Point . Doubling the ridiculous 3,000 number is unacceptable overdevelopment of the residential areas that will affect everyone in Castle Point. I am not against development, as proven in my term as Chairman of Development Control , but must be right numbers in the right place . Please consider my points in your consideration of the soundness of the Castle Point Plan .							without this planned expansion. When I was involved in this plan, I seem to recall the urban area development capacity was estimated to be over 1,000, and a maximum including car parks , supermarkets, etc., was 3,000, and at that time, I raised concerns that maximising urban development would destroy Castle Point . Doubling the ridiculous 3,000 number is unacceptable overdevelopment of the residential areas that will affect everyone in Castle Point. I am not against development, as proven in my term as Chairman of Development Control , but must be right numbers in the right place .		
0422-0001	Individual	Michael	Harvey		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N	

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0711-0001	Individual	Philip	haste		Yes	SP3	Yes		No	Positively prepared, Effective, Justified	Much better sites are available rather than worsen a already congested Canvey island and in fact the whole of castle point There is land in North Benfleet (green belt it may be but there is so much more beneficial green belt around and this is a small amount to sacrifice) adjacent to the A127/A130 that could have great road links installed and accommodate all of Castle points housing developments to satisfy Government in one place. A sacrifice of 1 small piece of Green belt should be considered rather than sacrifice the well being of existing and future people of castle point by making there lives a misery by over congesting existing small areas. Before any passing of developments my comment should be considered below	Before any planning is approved or development is carried out the existing road structure on canvey island needs to be looked at. The 1st is to proceed with the development of Roscommon way phase 2 to greatly improve traffic flow around the island. The 2 main traffic problem areas are Sommes avenue to Dovernelt road both ways as well as Northwick corner through the village to Thorney bay road. By extending the Roscommon way phase 1 with phase 2 as originally planned but never completed. Essex Highways' Roscommon Way Extension Phase 2 was planned to extend the new	No	Not Answered	Not Answered	A	North West Thundersley Third Road onto Canvey	North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending	N

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												<p>route from Haven Road to Thorney Bay Road on Canvey Island, providing an alternative route for commercial traffic and supporting future development. While Phase 1 was completed, Phase 2 faced funding issues in 2018 and remains unfinished, with the completion of the final phase described as "vitaly important" for easing congestion and supporting the local economy. Phase 1 (Completed)</p> <p>Phase 2 (Planned, but Unfinished) Planned Extension: Phase 2 was designed to continue the route from Haven Road to Thorney Bay Road.</p>							<p>interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the</p>	

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												<p>Aims: The goals included further regenerating the local economy, providing a flood-safe route off the island, diverting traffic from residential areas, and enabling further development.</p> <p>Funding Issues: In 2018, a report stated that there was "no cash" to finish the project, and the completion of the final phase was described as "vitaly important" for the local economy and for easing island congestion. This would be a great step to alleviate the traffic congestion on Canvey and should have been carried out in 2018. However the</p>								development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	

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												third road (where that assumption comes from I don't know as there is still only 1 access point onto Canvey where the two access roads meet which is Waterside Farm roundabout) A new route continuing Northwick Road across to Coryton/Stanford-le-hope should be urgently considered. This would reduce traffic on the already congested saddler's farm roundabout although most likely increase traffic flow onto the island with vehicles accessing south Benfleet via Canvey								

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0765-0001	Individual	jaqueline	haste	betafit kitchens	Yes	SP3	No	FAILED TO CONSIDER STRATEGIC ALTERNATIVES LIKE NORTH WEST THUNDERSLEY. NO CREDIBLE 5 YEAR HOUSING SUPPLY	No	Justified, Consistent with national policy	The draft local plan is not justified with national policy. Doesn't meet the housing target for castle point. Site selections ignore Greenbelt/Grey belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt built policy" Site selection is based on the overdevelopment of Brownfield sites. Not all sites considered, No Greenbelt/grey belt sites added and with the exclusion of North west Thundersley. NPPF guidelines state development should be directed away from area's at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3316 Urban homes for Canvey is not resident led. Canvey West homes puts residents in the East of Canvey at risk with emergency evacuation procedures.	ADD North west Thundersley site. 187Ha A greenbelt Grey belt Brownfield site option for 7500 homes Reduce the urban housing target to 3500 from 6200 with Canvey at 1050 Total housing target of 11000 homes	No	Not Answered	Not Answered	A	Lack of Five Year Housing Land Supply Green/Grey Belt not considered North West Thundersley Flood Risk on Canvey Emergency Evacuation Concerns	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	N

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																		<p>common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>Green/Grey Belt</p>	

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																		<p>The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to;</p> <p>Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point,</p>	

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																		<p>Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August</p>	

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																		<p>2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Flooding on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management</p>	

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																		<p>infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/</p>	

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0780001	Individual	Dean	Haste		Yes	SP3	No	FAILED TO CONSIDER STRATEGIC ALTERNATIVES LIKE NORTH WEST THUNDERSLEY. NO CREDIBLE 5 YEAR HOUSING SUPPLY	No	Justified, Consistent with national policy	The draft local plan is not justified with national policy. Doesn't meet the housing target for castle point. Site selections ignore Greenbelt/Grey belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt built policy" Site selection is based on the overdevelopment of Brownfield sites. Not all sites considered, No Greenbelt/grey belt sites added and with the exclusion of North west Thundersley. NPPF guidelines state development should be directed away from area's at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3316 Urban homes for Canvey is not resident led. Canvey West homes puts residents in the East of Canvey at risk with emergency evacuation procedures.	North west Thundersley site. 187Ha A greenbelt Grey belt Brownfield site option for 7500 homes Reduce the urban housing target to 3500 from 6200 with Canvey at 1050 Total housing target of 11000 homes	No	Not Answered	Not Answered		Lack of Five Year Housing Land Supply Green/Grey Belt not considered North West Thundersley Flood Risk on Canvey Emergency Evacuation Concerns	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	N

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																		<p>common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>Green/Grey Belt</p>	

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																		<p>The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to;</p> <p>Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point,</p>	

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																		<p>Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August</p>	

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																		<p>2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Flooding on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management</p>	

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																		<p>infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/</p>	

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06790001	Individual	Dawn	Hawes		Yes	SP3	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	<p>ENV1 protecting our green spaces.</p> <p>Our island is reclaimed land from the sea . Before 1600 only cows were graced here, until the Dutch came over and undertook the task of reclaiming the land. We are below sea level.</p> <p>There is no plan to evacuate current residence if we were to have another flood like the one in 1953.</p> <p>There are now floodgates to save London , which put Canvey island at a higher risk of flooding. The Dutch cottages are historic and need a preservation order on them , if they have not already got one.</p> <p>The land is mostly clay under a few feet of top soil.</p> <p>The island has a population of over 50% people over 60 years old.</p> <p>There is not enough work on the island for everybody that lives here. Therefore people need to travel on and off the island to work.</p> <p>We do not have a train or a station on the island .</p> <p>There is one road off that leads to Sadlers farm roundabout.</p> <p>Another small crossing to south Benfleet . If you don't want to go to Southend then you will probably end up back on Sadlers farm roundabout.</p> <p>So unless we have some other means of travel on and off the island, it will be gridlocked. It often is already with just one small accident , blocking the traffic.</p> <p>Please take into consideration before building over 3,000</p>		No	Not Answered	Not Answered	A	<p>No plan to evacuate in event of flooding</p> <p>Flood risk on canvey Dutch cottage needs protecting</p> <p>Elderly population</p> <p>No work</p> <p>Third road onto canvey</p> <p>So many houses are not needed due to population decrease</p> <p>Danger of petrol and chemical storage</p> <p>Lack of infrastructure</p>	<p>Evacuation procedures</p> <p>The Councils detailed emergency planning pages are here</p> <p>www.castlepoint.gov.uk/emergencyplanning/</p> <p>Flood Risk on Canvey</p> <p>Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk.</p> <p>Furthermore, flooding and the need for flood management infrastructure is</p>	N

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											<p>dwelling.</p> <p>Our population is reducing . Couples now have 1.5 children per family.(national statistics say) . Maybe so many dwellings are not needed.</p> <p>Last but not least is the petrol, chemical storage on the island. It is huge. What would happen if this catches fire? This needs taking into consideration . I think over 3,000 dwellings is far too many. Current infrastructure cannot handle this many people.</p>												<p>covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.</p> <p>Dutch Cottage Dutch Cottage is a listed building and no development on the land surrounding the cottage is proposed within this Plan.</p> <p>Elderley Population Policy HOU4 makes provision for specialist housing, including the elderly, which has been based on the need identified in the Local Housing Needs Assessment 2023 and the Local Housing Needs Assessment Update 2025.</p> <p>No work Chapter 14 of the Castle Point</p>	

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																		<p>Plan details how the plan will help to support the local economy.</p> <p>Third Road onto Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the</p>	

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																		<p>Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.</p> <p>So many houses are not needed due to population decrease The Local Housing Needs Assessment 2023 and the Local Housing Needs Assessment Update 2025 details the housing need within the Borough. The</p>	

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																		<p>Housing Capacity Topic paper explains in detail how the number of homes allocated within the plan has been reached.</p> <p>Dangers of Petrol and Chemical Storage As set out in Plan paragraph 8.28 'Both port facilities are registered as Control of Major Accident Hazards (COMAH) sites due to the hazardous nature of the goods that they receive and store. The Health and Safety Executive (HSE) and the Environment Agency are responsible for regulating activities at these sites, and also provide advice on the level of hazard the installations pose to nearby development. Both installations</p>	

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																		have HSE consultation zones identified around them, in which it is expected that other development is controlled to limit unnecessary harm to life and property. The extent of these zones is determined by the nature of the goods received and stored on site, and the technical measures employed to ensure safety at the sites. It is therefore possible that the level of hazard posed to other developments nearby can be reduced, both by limiting development nearby, and also by seeking improvements to the level of hazard posed by these sites, both during normal management and maintenance, and also at the point where new	

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																		<p>development is proposed.'</p> <p>The current HSE consultation zones are indicated on the policies map. The plan doesn't propose any new housing allocations in the HSE consultation zone. However, some existing residential areas are already within the zone, as well as the Thorney Bay Park Homes site.</p> <p>Policy SD8 'Development near Hazardous Uses' states that 'Development proposals will be assessed in accordance with the Health and Safety Executive (HSE) Guidance where they fall within a consultation zone for one or more hazardous installations. Where the HSE advises against development the planning application will be refused on</p>	

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																		health and safety grounds'. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	

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0531-0001	Individual	Lynn	Hawkes		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park H031. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped	N

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											evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.	Strategic alternatives North west	

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																		<p>Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p>Green/Grey Belt The Council has</p>	

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																		undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the	

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																		<p>impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergen</p>	

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																		<p>cyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation</p>	

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																		Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0531-0002	Individual	Lyn	Hawkes		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing	N

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																		<p>commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025).</p> <p>Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt.</p> <p>That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the</p>	

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																		Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0531-0003	Individual	Lynn	Hawkes		Yes	Foreword					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N

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0539-0001	Individual	Gary	Hawkes		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped	N

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											evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.	Strategic alternatives North west	

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																		<p>Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p>Green/Grey Belt The Council has</p>	

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																		undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the	

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																		<p>impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergen</p>	

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																		<p>cyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation</p>	

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																		Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0539-0002	Individual	Gary	Hawkes		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing	N

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																		<p>commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025).</p> <p>Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt.</p> <p>That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the</p>	

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																		Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.		
0539-0003	Individual	Gary	Hawkes		Yes	Foreword					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.						A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N

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12420001	Individual	Robert	Hawkins			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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																		<p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u></p>	

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																		Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
12420002	Individual	Robert	Hawkins			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
12	Individual	Robert	Hawkins			C4					The number of Canvey West homes puts residents in the East						Development at West Canvey will impact	The safety of all Castle Point	N

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420003											at risk with emergency evacuation procedures.						emergency evacuation procedures for those residents living at East Canvey	residents is a priority and has been considered within the Castle Point Plan	
13160001	Individual	Valerie	Hawkins			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
13160002	Individual	Valerie	Hawkins			SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			No five year housing land supply North West Thundersley should have been included Approach to Green/Grey Belt NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's	

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																		land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be	SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		<p>used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West</p>	

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																		<p>Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the</p>	

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																		<p>capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Flooding Flood risk covered in policies and the supporting</p>	

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																		Strategic Flood Risk Assessment (SFRA), including in relation to Canvey. SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
13160003	Individual	Valerie	Hawkins			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
13170001	Individual	John	Hawkins			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/P ara No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a . So un d?	3b. Positive/Effect ive/Justified/C onsistent?	3c. Explanation	4. Suggested modifications	5. Wis h to part icip ate in exa m	6. Why ?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
13170002	Individual	John	Hawkins			SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			No five year housing land supply North West Thundersley should have been included Approach to Green/Grey Belt NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).	

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																		<p>common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West</p>	

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																		<p>Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by</p>	

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																		strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local	

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																		<p>highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to Canvey. SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS</p>	

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																		design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1317-0003	Individual	John	Hawkins			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0228-0001	Individual	Charles	Hayden		Not Stated	SP3	Not Stated	Why on earth would you want to build more houses on Canvey Island it cannot deal with the traffic now so if you decide to build more homes what would happen in an emergency you people that give the go ahead obviously do not live on	Not Stated	Not Stated			Not Stated		No		Too many houses proposed for Canvey Island. Traffic already a problem. Concerned if there was a future emergency.	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP). The plan has been subject to	N

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								Canvey Island if there was an emergency at the moment without any new homes it would be a struggle to get of, so in the event of an emergency who would take responsibility I bet it would be pushed from one person to another meaning no body would , I speak for everyone who live on Canvey Island, it's disgusting how people hear get treated.										detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy ' A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan	
0466-0001	Individual	Deborah	Haynes		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N

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11560001	Individual	Robert	Herd			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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																		<p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u></p>		

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																		Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
11560002	Individual	Robert	Herd			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
11	Individual	Robert	Herd			C4					The number of Canvey West homes puts residents in the East						Development at West Canvey will impact	The safety of all Castle Point	N

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560003											at risk with emergency evacuation procedures.						emergency evacuation procedures for those residents living at East Canvey	residents is a priority and has been considered within the Castle Point Plan	
1157001	Individual	Elizabeth	Hear			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.				Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)	

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																	urban homes for Canvey is not resident led	the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered	

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sounded?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																		under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1157002	Individual	Elizabeth	Herd			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
								which improves the overall site environment for the local residents.											
11570003	Individual	Elizabeth	Hear			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
12250001	Individual	Ken	Hear			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.				Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding,	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)	

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																	<p>SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led</p> <p>realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.</p> <p><u>Consideration of All Sites</u></p> <p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p><u>North-West Thundersley</u></p> <p>Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West</p>		

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																		Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1225-0002	Individual	Ken	Herd			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/P ara No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a . So und?	3b. Positive/Effect ive/Justified/C onsistent?	3c. Explanation	4. Suggested modifications	5. Wis h to part icip ate in exa m	6. Why ?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
								our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1225-0003	Individual	Ken	Hear d			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1226-0001	Individual	Carol	Hear d			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.				Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)	

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								Thundersley and it has no credible five-year housing land supply.			infrastructure , the proposed 3316 urban homes for Canvey is not resident led						West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In	

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																		<p>addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.</p>	
1226-	Individual	Carol	Hearld			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes									Policy HOU5 should make provision for improved site	Comments noted. Policy HOU5 does not restrict	N

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0002								the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									environment for the local residents	improvement to the sites environment	
1226-0003	Individual	Carol	Herd			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1236-0001	Individual	Barbara	Hedges			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at					Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	1050. Total housing target of 11,000.					Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for	

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																		allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered	

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																		through the SFRA.	
12360002	Individual	Barbara	Hedges			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
12360003	Individual	Barbara	Hedges			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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0423-0001	Individual	Natasha	Heldth		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
1263-0001	Individual	Marilyn	Hellicar			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.				Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)	

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																	<p>geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led</p> <p>approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.</p> <p><u>Consideration of All Sites</u></p> <p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p><u>North-West Thundersley</u></p> <p>Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p><u>Green Belt/Grey</u></p>		

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																		<p><u>Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments.</p> <p><u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA).</p> <p><u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.</p>	
12630002	Individual	Marilyn	Hellcar			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
12630003	Individual	Marilyn	Hellier			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
08550001	Individual	June	Henderson		Yes	HAD4	Yes		No	Positively prepared, Effective, Justified	[Redacted Personal Information] and already the road gets grid locked from the amount of cars parked in between junctions of Bolton and broughton Road on scrub lane. This is because of the mini estate allowed to be built between these two junctions without adequate parking. It seems the average number of cars per household is now about three. Your proposal for 114 homes is scandalous as it would see at least another 250 to 300 cars. As it is scrublane is used as a rat run thus the the sleeping policemen already built into the road. This proposal has not taken in to account all the other local issues such as impact on already over subscribed surgeries and schooling.		No	Not Answered	Not Answered		Objects to HAD4 because: Traffic Parking Infrastructure	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Parking Capacity Any application for homes on this site will have to comply with policy T7 which requires the EPOA Parking Guidance (Part 1 and 2) to be implemented.	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/P ara No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a . So und?	3b. Positive/Effect ive/Justified/C onsistent?	3c. Explanation	4. Suggested modifications	5. Wis h to part icip ate in exa m	6. Why ?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																		Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
0941-0001	Organisation	Izzi	Henders on	Anchor Hanover Group	Yes	HOU4	Yes		No	Effective	Anchor is England's largest provider of specialist housing and care for those in later life. We fully support setting a clear target for homes for older people, divided between retirement/sheltered, extra care and care homes. This approach aligns with national planning policy, which is clear that planning policies should reflect the need for different types of housing to meet the diverse needs of older people. We encourage Castle Point Council to make specific allocations for older persons' housing through its local plan policies to meet the identified need, in addition to requiring a percentage of homes to be built to M4(2) and M4(3) standards. This is because accessible homes are not typically reserved for older people. When making allocations, consideration should be given to the minimum number of older persons' homes needed on a site to ensure viability, which in Anchor's experience is at least 65.	Make specific allocations for older persons' housing, in addition to M4(2) and M4(3) standards. Allow flexibility in housing mix for older persons' housing.	No	Not Answered	Not Answered	A	Supports HOU4 but requests that it be ammended to make specific allocations for older persons' housing through its local plan policies to meet the identified need, in addition to requiring a percentage of homes to be built to M4(2) and M4(3) standards.	Policy HOU4 makes provision for specialist housing, including the elderly, which has been based on the need identified in the Local Housing Needs Assessment 2023 and the Local Housing Needs Assessment Update 2025. By requiring M4(2) and M4(3) standards we can can also provide specialist accomodation for other needs such as wheelchair accessible dwellings.	N

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											The supporting text recognises that homes for older people will mostly be needed as one and two-bedroom properties. Anchor's new developments typically comprise single buildings with around 70 high-quality social rent homes. Social rent homes for older people are mainly one-bedroom, as two-bedroom homes are difficult to let due to the under-occupancy charge and the predominance of single-person households. Flexibility in housing mix is therefore essential to ensure the viability and successful delivery of older persons' housing to meet needs.										
0358001	individual	T	Hertage			Whole Plan	Yes		Yes							A	Castle Point Plan is sound and legally compliant,	Support noted.	N		

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10090001	Individual	Ron	Heyron		Yes	SP3	No	The plan fails to meet targets imposed and this invites the central government of intercede	No	Justified, Consistent with national policy	<p>It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.</p> <p>It is not justified, the site selection strategy is biased and predetermined towards a "no greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site.</p> <p>I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt.</p> <p>I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, needing planning objections with respect to urban sprawl, it's a buffer zone, the effect on</p>	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, and Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered		<p>Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh</p>	<p>Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology.</p> <p>However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point.</p> <p>The Castle Point Plan Regulation 19 Draft makes</p>	N

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											<p>highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction.</p> <p>We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.</p>								<p>provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025.</p> <p>Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan</p>	

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																		and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11	

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																		<p>onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport</p>	

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																		<p>evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle</p>	

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																		<p>Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out</p>	

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																		above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	

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0875-0001	Individual	Lin	Heys		Yes	SP3	No	<p>Objection to the Draft Castle Point Local Plan for Canvey Island</p> <p>1. Introduction</p> <p>I am writing to object to the Draft Castle Point Local Plan on the grounds that it is not legally compliant and not sound.</p> <p>2. Legal Compliance</p> <p>The plan does not meet the requirements of the National Planning Policy Framework (NPPF) or the associated regulations because:</p> <p>It fails to demonstrate adequate infrastructure provision to support the proposed scale of housing development.</p> <p>It does not provide sufficient evidence that the plan has been positively prepared with regard to education, healthcare, transport, and emergency planning.</p> <p>3. Soundness</p> <p>For a Local Plan to be considered sound, it</p>	No	Consistent with national policy			No	Not Answered	Not Answered	A	Infrastructure Transport Emergency Planning Flood Risk Third Road to Canvey Hazardous and Port Related Activities	Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	Transport The plan has been subject to detailed Transport Assessment, assessing impacts and recommending local interventions. These are identified in the Infrastructure Delivery Plan. Alongside this, the Local Transport Authority, Essex County Council, have prepared the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex includes wider local improvements to transport networks in and around Castle	N

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								<p>must be positively prepared, justified, effective, and consistent with national policy. The Castle Point Plan fails in all four respects:</p> <p>3.1 Infrastructure Capacity</p> <p>Drainage and Flood Risk: The plan does not include adequate drainage provision to mitigate the impact of new development. This raises significant concerns about flood risk and public safety.</p> <p>Education Provision: The recent closure of the local secondary school leaves no capacity for the additional school places required. This is contrary to the NPPF requirement for sustainable communities.</p> <p>Healthcare: There are already insufficient numbers of GPs and healthcare facilities. No new provision is included to meet the increased demand.</p> <p>3.2 Transport and Safety</p> <p>The island has only</p>												<p>Point, including improved linkages to other areas. Growth in Castle Point will facilitate the delivery of the proposals in the Local Transport Plan 4.</p> <p>Emergency Planning The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/</p> <p>Flood Risk The Strategic Flood Risk Assessment provides an overview of flood risk within Castle Point and then provides site specific information for the allocations in the Castle Point Plan and provides recommendations on how to address any flood risk arising through development.</p> <p>Third Road to Canvey</p>	

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								<p>one road for access and evacuation. This represents a serious risk to life in the event of flooding, a gas explosion, fire, or other emergencies. A plan that increases population without addressing this fundamental issue cannot be considered safe, effective, or sustainable.</p> <p>4. Conclusion</p> <p>The Draft Castle Point Local Plan is unsound and not legally compliant because it fails to provide for adequate infrastructure, drainage, education, healthcare, and emergency access. It does not comply with the NPPF or ensure the safety and wellbeing of residents.</p> <p>I therefore formally object to the plan in its current form.</p>											<p>The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically</p>	

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																		<p>identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.</p> <p>Hazardous and Port Related Activities As set out in Plan paragraph 8.28 'Both port facilities are registered as Control of Major Accident Hazards (COMAH) sites due to the hazardous nature of the goods that they receive and store. The Health and Safety Executive (HSE) and the Environment Agency are responsible for</p>	

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																		regulating activities at these sites, and also provide advice on the level of hazard the installations pose to nearby development. Both installations have HSE consultation zones identified around them, in which it is expected that other development is controlled to limit unnecessary harm to life and property. The extent of these zones is determined by the nature of the goods received and stored on site, and the technical measures employed to ensure safety at the sites. It is therefore possible that the level of hazard posed to other developments nearby can be reduced, both by limiting development nearby, and also	

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																		<p>by seeking improvements to the level of hazard posed by these sites, both during normal management and maintenance, and also at the point where new development is proposed.'</p> <p>The current HSE consultation zones are indicated on the policies map. The plan doesn't propose any new housing allocations in the HSE consultation zone. However, some existing residential areas are already within the zone, as well as the Thorney Bay Park Homes site.</p> <p>Policy SD8 'Development near Hazardous Uses' states that 'Development proposals will be assessed in accordance with the Health and Safety Executive (HSE) Guidance where they fall</p>	

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																		within a consultation zone for one or more hazardous installations. Where the HSE advises against development the planning application will be refused on health and safety grounds'.	
13250001	Individual	Julie	Hicks			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1320002	Individual	Julie	Hicks			SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			No five year housing land supply North West Thundersley should have been included Approach to Green/Grey Belt NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).	

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																		<p>common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West</p>	

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																		<p>Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by</p>	

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																		strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local	

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																		<p>highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to Canvey. SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS</p>	

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																		design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
13250003	Individual	Julie	Hicks			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
13260001	Individual	Brian	Hicks			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
1320002	Individual	Brian	Hicks			SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			No five year housing land supply North West Thundersley should have been included Approach to Green/Grey Belt NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).	

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																		<p>common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West</p>	

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																		<p>Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by</p>	

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																		strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local	

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																		<p>highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to Canvey. SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS</p>	

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																		design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1326-0003	Individual	Brian	Hicks			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0408-0001	Individual	Trevor	Higgins		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, consistent with national policy	It is not consistent with national policy, as it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt/ Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			A	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																		<p>Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.</p> <p><u>North-West Thundersley</u></p> <p>Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p><u>Consideration of All Sites</u></p> <p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). Green Belt/Grey</p>	

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0408-0002	Individual	Trevor	Higgins		Yes	C4	No				The proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.					A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0409-0001	Individual	Betty	Higgins		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, consistent with national policy	It is not consistent with national policy, as it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt/ Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			A	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																		<p>Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.</p> <p><u>North-West Thundersley</u></p> <p>Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p><u>Consideration of All Sites</u></p> <p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). Green Belt/Grey</p>	

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																		<p><u>Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.</p>	
0409-0002	Individual	Betty	Higgins		Yes	C4	No				The proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.					A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/ Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/ Comments?	Policy/P ara No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a . So und?	3b. Positive/Effect ive/Justified/C onsistent?	3c. Explanation	4. Suggested modifications	5. Wis h to part icip ate in exam	6. Why ?	Sup port ing Evid enc e sup plied?	Opti on A, B or C	Summary	Officer Response	Mods Required
0513-0001	Individual	Joan	Hill		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped	N

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											evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.	Strategic alternatives North west	

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																		<p>Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p>Green/Grey Belt The Council has</p>	

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																		undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the	

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																		<p>impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergen</p>	

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																		<p>cyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation</p>	

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																		Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0513-0002	Individual	Joan	Hill		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing	N

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																		<p>commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025).</p> <p>Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt.</p> <p>That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the</p>	

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																		Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.		
0513-0003	Individual	Joan	Hill		Yes	Fore word					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.						A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N

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12570001	Individual	John	Hill			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.				Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)	

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																		<p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u></p>	

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																		Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
12570002	Individual	John	Hill			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
12	Individual	John	Hill			C4					The number of Canvey West homes puts residents in the East						Development at West Canvey will impact	The safety of all Castle Point	N

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57-0003											at risk with emergency evacuation procedures.						emergency evacuation procedures for those residents living at East Canvey	residents is a priority and has been considered within the Castle Point Plan	
1405-0001	Individual	Margorie	Hill		Yes	Whole Plan	Yes	I support the Castle Point Plan Draft I consider the Draft Plan to be legally compliant	Yes		I consider the Draft Plan to be sound. I have lived at the above address for the last 55 years. The Drs was where williams opticians was before now. As you mentioned it isa a nightmare to even get a Drs appointment now and to get in and out clare road is a nightmare as no one will give way to you. We have 2 or 3 houses built end of Ivy Road and when we got to end of the road we kept being met with builders lorries so we couldnt get into Wycombe Ave let alone Clare as they have had Buildier working on the corner as well.						Castle Point Plan is sound and legally compliant, Concerns around health infrastructure and road network capacity when shared with vehicles associated with Building work	Support Noted	N
1241-0001	Individual	Terry	Hill			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at					Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	1050. Total housing target of 11,000.					Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for	

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																		allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered	

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																		through the SFRA.	
12410002	Individual	Terry	Hill			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
12410003	Individual	Terry	Hill			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1181-001	Individual	Michael	Hillman			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.				Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)	

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																		<p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u></p>	

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																		Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1181-0002	Individual	Michael	Hillman			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
11181-0003	Individual	Michael	Hillman			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0787-0001	Individual	Raymond	Hilton		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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0614-0001	Individual	Susan	Hinton		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped	N

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											evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.	Strategic alternatives North west	

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																		<p>Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p>Green/Grey Belt The Council has</p>	

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																		undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the	

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																		<p>impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergen</p>	

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																		<p>cyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation</p>	

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																		Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0614-0002	Individual	Susan	Hinton		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing	N

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																		<p>commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025).</p> <p>Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt.</p> <p>That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the</p>	

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																		Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0614-0003	Individual	Susan	Hinton		Yes	Foreword					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N

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115-001	Individual	Sylvia	Hobday			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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																		<p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u></p>	

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																		Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
115-0002	Individual	Sylvia	Hobday			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
11	Individual	Sylvia	Hobday			C4					The number of Canvey West homes puts residents in the East						Development at West Canvey will impact	The safety of all Castle Point	N

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550003											at risk with emergency evacuation procedures.						emergency evacuation procedures for those residents living at East Canvey	residents is a priority and has been considered within the Castle Point Plan	
08250001	Individual	Jayne	Hodges		Yes	SP3	No	There is no credible 5 year housing land supply There has been no strategic alternatives such as the North West Thundersley area considered	No	Justified, Consistent with national policy	The draft plan is not consistent with national policy. This does not meet the housing target for Castlepoint. Site selection ignores Greenbelt/Greybelt against new NPPF guidelines Draft local plan is not justified. The site selection strategy is biased and predetermined towards a non greenbelt build policy. Site selection is based on the over development of brownfield sites. This has not considered all sites no green or grey belt land added with the exclusion of NW Thundersley, NPPF guidelines state development should be directed away from areas of highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Add the North West Site 187Ha a Greenbelt/Grey Belt/Brownfield site option for 7500 homes. reduce the urban housing target to 3500 from 6200. with Canvey at 1050 Total housing target 11,000	No	Not Answered	Not Answered	A	Not meeting standard method Lack of Five Year Housing Land Supply Green/Grey Belt not considered North West Thundersley Flood Risk on Canvey Emergency Evacuation Concerns	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale	N

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																		<p>of growth in Castle Point.</p> <p>The Castle Point Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025.</p> <p>Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard</p>	

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																		method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver	

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																		<p>231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several</p>	

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																		clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey	

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																		<p>belt is addressed under policy GB2.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Flooding on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is</p>	

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																		substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	Emergency Evacuation The Councils detailed emergency planning pages	

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																		are here www.castlepoint.gov.uk/emergencyplanning/	
0839-0001	Individual	Dawn	Hodgson		Yes	SP3	Yes		No	Justified	The road infrastructure with not support the number of proposed of dwellings	Lower number of properties in keeping with the surroundings and more suitable for the infrastructure	Yes	Not Answered	Not Answered	A	Roads and infrastructure not able to support the housing	Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Transport	N

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																		The plan has been subject to detailed Transport Assessment, assessing impacts and recommending local interventions. These are identified in the Infrastructure Delivery Plan. Alongside this, the Local Transport Authority, Essex County Council, have prepared the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex includes wider local improvements to transport networks in and around Castle Point, including improved linkages to other areas. Growth in Castle Point will facilitate the delivery of the proposals in the Local Transport Plan 4.	
0840-0	Individual	Carl	Hodgson		Yes	HAD4	Yes		No	Justified	Scrub lane is already a very busy road for traffic, particularly at school start and end times, it cannot cope with the additional		No	Not Answered	Not Answered		Objects to HAD4 due to traffic on scrub lane	Traffic Any application for homes on this site will have to comply with	N

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001											traffic that this development would deliver							policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation.	
11860001	Individual	Mr B	Hodgson			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.				Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)	

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																	<p>highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led</p> <p>that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.</p> <p><u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p><u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why</p>		

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/P ara No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a . So und?	3b. Positive/Effect ive/Justified/C onsistent?	3c. Explanation	4. Suggested modifications	5. Wis h to part icip ate in exa m	6. Why ?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																		North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1186002	Individual	Mr B	Hodgson			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
11860003	Individual	Mr B	Hodgson			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
11870001	Individual	Mrs B	Hodgson			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.				Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)	

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								like North West Thundersley and it has no credible five-year housing land supply.			unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led						exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport	

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																		evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
118	Individual	Mrs B	Hodgson			Hou 5		The plan has included Thorney Bay development for 173									Policy HOU5 should make provision for improved site	Comments noted. Policy HOU5 does not	N

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7-0002								homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									environment for the local residents	restrict improvement to the sites environment	
1187-0003	Individual	Mrs B	Hodgson			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0924-0001	Individual	daryl	hodsoll		Yes	Whole Plan	Yes		No	Justified			Not Answered	Not Answered	Not Answered		The Castle Point Plan is not Legally Compliant	Comment noted.	N

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0376-0001	Individual	Brett	Hole		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do not totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, puts the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.				A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes	N

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											links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan	

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																		and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11	

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																		<p>onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport</p>	

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																		<p>evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle</p>	

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																		<p>Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out</p>	

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																		above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	
01930001	Individual	Paul	Holland		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'.	PROPOSED MODIFICATION : Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumst

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											Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	ances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
01930002	Individual	Paul	Holland		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
01940001	Individual	Louise	Holland		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection	PROPOSED MODIFICATION : Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s)

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								Thundersley. It has no credible five-year housing land supply.			strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0194002	Individual	Louise	Holland		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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10000001	Agent	Sam	Hollingworth	Rainier Developments c/o Ceres Property	Yes	Foreword	No		No		<p>1.1 These representations on the Castle Point Local Plan 2026-2043 Regulation 19 Draft ('the Draft Local Plan' or 'DLP') are made on behalf of Rainier Developments & Strategic Land ('Rainier').</p> <p>1.2 Rainier is promoting Land South of Daws Heath Road, Thundersley ('the Site') for a residential development of c.58 new homes, 50% of which are to be provided as affordable homes.</p> <p>1.3 The Site is Green Belt but considered to meet the definition of grey belt as per the NPPF with reference to the guidance in PPG. It is suitable, available and achievable for residential development, and able to contribute towards meeting the Borough's acute market and affordable housing shortages. The Site, however, is not proposed to be allocated for residential development in the DLP.</p> <p>1.4 The DLP in its currently form is considered to be unsound when considered against the soundness tests set out in the NPPF.</p> <p>1.5 Its failure to even attempt to meet minimum housing requirement as per the NPPF renders it very much contrary to national policy, and is perhaps the most immediately apparent defect, as well as its most significant.</p> <p>1.6 However, there are a number of other soundness concerns evident in respect of the DLP, including in relation to its approach to considering flood</p>		Yes	Not Answered	Yes - See attachments	B - updated attachments	<p>Considers the plan to be unsound due to concerns regarding</p> <ul style="list-style-type: none"> - not meeting the minimum housing requirement - flood risk assessment - deliverability of homes proposed - the SA - Duty to cooperate 	Comments noted and response provided to specific policy comments	N

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											<p>risk issues as well as the deliverability of the limited number of new homes the DLP does suggest it will deliver.</p> <p>1.7 Additionally, we have concerns with legal compliance, specifically vis-à-vis the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations') and the Sustainability Appraisal (SA) which accompanies the DLP.</p> <p>1.8 We also have concerns as to whether the Duty to Cooperate has been complied with in the preparation of the DLP.</p> <p>1.9 This representation is structured as follows: Section 2 considers the DLP and the Duty to Cooperate Section 3 sets out concerns in relation to the DLP in terms of its compliance with the SEA Regulations. Section 4 considers Policy SP3 (Meeting Development Needs), and why it is considered unsound Section 5 addresses Policy DH2 (Coalescence of Settlements – Daws Heath), and why it is considered unsound Section 6 discusses the site selection process, and in particular its approach to Green Belt sites and, specifically, the Site. Section 7 sets out a summary and conclusion.</p>													

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10000002	Agent	Sam	Hollingerworth	Rainier Developments c/o Ceres Property	Yes	DTC	No		No		<p>2.1 The Duty to Cooperate is a legal requirement placed on local planning authorities, county councils, and certain public bodies in England under the Localism Act 2011 and the Planning and Compulsory Purchase Act 2004. It requires these authorities to engage constructively, actively, and on an ongoing basis to maximize the effectiveness of Local Plan preparation in addressing strategic cross-boundary matters.</p> <p>2.2 Key requirements of the duty to cooperate in relation to Local Plans include: Engaging with neighbouring and relevant authorities early and throughout the plan-making process on strategic matters that cross administrative boundaries. Demonstrating effective joint working, which may involve joint evidence gathering, assessment, and policy development to address shared issues like housing, infrastructure, transport, and environmental impacts. Considering formal arrangements such as joint plans, agreements, or joint committees for strategic planning where appropriate. Providing robust evidence of cooperation efforts, including who was engaged, the nature and timing of cooperation, and how it influenced the Local Plan. This evidence is critical for the examination of the Local Plan. Local Plans must reflect strategic priorities, including unmet needs from neighbouring authorities</p>		Not Answered	Not Answered	Yes - See attachments	B - updated attachments	Lack of evidence of Duty to Cooperate - especially needed since not meeting housing need.	Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. The Council has worked collaboratively with all to ensure that the Duty to Cooperate has been met.	N

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											<p>where reasonable and consistent with sustainable development.</p> <p>2.3 Whilst the Duty to Cooperate is not a duty to agree, Authorities should make every effort to cooperate.</p> <p>2.4 Castle Point Borough is part of a wider housing market area that includes the administrative areas of Basildon, Rochford, Southend-on-Sea and Thurrock. This geography is particularly germane in the context of the Duty to Cooperate, given the DLP claims it is unable to meet the Borough's housing needs in full. Indeed, it is clear from Policy SP3 that the DLP will fall a long way short of meeting minimum housing needs in the early years of the plan in particular – less than a third of its minimum requirement in the first five years.</p> <p>2.5 Given this, we would have expected to see clear evidence that the Council has engaged positively and proactively with its neighbours within the housing market area to seek to determine how the level of need the DLP fails to meet could be accommodated elsewhere, even if not in full. There is no evidence in the DLP of any engagement having taken place, nor is there anything within the DLP which confirms the outcomes of any engagement.</p> <p>2.6 There is reference in the Castle Point Borough Council Housing Capacity Topic Paper (August 2025) to discussions having taken place under the Duty to Cooperate with neighbouring authorities.</p>													

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											<p>However, no details are provided as to the nature of such discussions, outcomes, etc. Furthermore, the reference relates only to neighbouring authorities' views obtained July-September 2024 on the Council's Local Housing Needs Assessment, prepared in 2023 – work that needs to be fundamentally reconsidered in light of the 2024 NPPF and revised PPG, and the approach Councils are now required to take in order to address the housing crisis.</p> <p>2.7 It is clear that significant further work is required by the Council in order for it to be able to demonstrate that it has carried out the Duty to Cooperate positively and proactively.</p>									

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1000003	Agent	Sam	Hollingworth	Rainier Developments c/o Ceres Property	Yes	SP3	No		No		<p>4.1 Policy SP3 is fundamentally unsound. It is unjustified, fails to ensure the DLP is positively prepared, is clearly contrary to national policy, and there are substantial concerns with its effectiveness. The reasons for this are set out below.</p> <p>4.2 Furthermore, it would appear the Council is itself that its DLP is highly unlikely to be found sound, as evidence by correspondence between it and the Minister of State for Housing and Planning at MHCLG, as discussed within this section.</p> <p>Quantum</p> <p>4.3 Policy SP3 suggests the DLP will deliver 6,196 homes over the period 2026-2043, which equates to an average of 364 dpa. This is despite acknowledging at paragraph 6.52 that its housing requirement for this period is 11,662 (albeit, seemingly not recognising that this is a minimum) as per the NPPF and the approach to calculating local housing needs set out in the PPG.</p> <p>4.4 Assuming the DLP were to deliver all the homes it purports to (and there are substantial doubts that it will, as we discuss later within this representation), this will leave a shortfall of 5,466 dwellings over the plan period. The DLP is seeking to provide just 53% of what the NPPF expressly requires the DLP to deliver as a minimum. There are no indications that there are robust arrangements in place to ensure that the Borough's residual local housing need will be met elsewhere within the housing</p>		Not Answered	Not Answered	Yes - See attachments	B - updated attachments	<p><u>Housing Supply</u> Suggests conflict with NPPF and PPG <u>Green Belt/Grey Belt</u> The substantial shortfall in housing provision proposed by the DLP is evidently a consequence of its refusal to amend the Borough's Green Belt boundaries. The DLP adopts an overly rigid, almost sacrosanct approach to the Green Belt, which is fundamentally at odds with national planning policy. In contrast, the NPPF makes clear that Green Belt boundaries can be altered through the Local Plan process where justified by exceptional circumstances, such as meeting identified housing needs. Highlights changes to NPPF Green/Grey Belt classification.. <u>Timescales for Delivery</u> In addition to concerns regarding the overall quantum of housing proposed, there are also significant issues with the timing of delivery set out in Policy SP3. Not only will the DLP fail to address local housing needs as per the NPPF, but the strategy will mean the shortage will be particularly acute in</p>	<p><u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. Within the NPPF Paragraph 11</p>	See Schedule of Modifications re: flooding

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											<p>market area.</p> <p>4.5 The Council's approach is clearly contrary to the NPPF. Not only that, but contrary to an aspect of the NPPF which the Government makes clear is critical for Local Planning Authorities to address as part of its approach to dealing with the national housing crisis.</p> <p>4.6 Even if one were to ignore that the DLP's approach to addressing need is in direct contradiction to the NPPF and PPG, the social and economic harm of failing to meet housing needs is vast, for the reasons we set out in Section 3 of this representation. However, such matters do not appear to have been given due consideration in determining the number of new homes.</p> <p>4.7 In Section 3 of this representation, we set out our concerns pertaining to Policy SP3 in terms of the SA and the SEA Regulations. Plainly, such concerns also go to the soundness of the DLP, particularly insofar as concerns the need for Local Plans to be justified and the important role sustainability appraisal should play in this. It is clear from the SA that the DLP's purported justification for failing to meet housing needs is based on specious reasoning which fails to properly evaluate the effects of seeking to meet housing needs versus failing to do so, particularly in respect of affordable housing.</p> <p>4.8 The DLP's significant shortfall in proposed housing provision</p>						<p>the first 10 years of the plan period.</p> <p><u>Densities</u> The DLP suggests the proposed approach will require a density of 150 dph – an extremely high density compared to existing development within the Borough, and one that will necessitate flatted development. There is a lack of evidence to substantiate if it is even feasible for a development of this nature could be delivered whilst also providing for a variety of house types as needed and / or meeting the development management standards the DLP proposes.</p> <p><u>Flood Risk</u> The NPPF is clear that development should be directed away from areas at higher risk of flooding. Given that there are alternative sites within the Borough subject to lower flood risk—which have been rejected—the DLP's approach in this regard is not justified. The DLP does not appear to be supported by a sequential test that could justify such an approach as the NPPF</p>	<p>section b (a) and (ii) give an acknowledgment of circumstances in which national policy does not expect Standard Method outcomes to be met in full.</p> <p><u>Housing Supply – 5 Year Supply and Timescales</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.</p> <p><u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments.</p> <p><u>Densities</u> Policy Hou3 indicates the housing mix, including in Premium sustainability areas.</p> <p><u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA).</p>	

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											<p>when compared to the minimum number required to ensure the DLP is capable of being found sound is evidently a function of the Council's refusal to make any alterations to the Borough's Green Belt. The DLP suggests a sacral approach to the Green Belt which is totally at odds with national planning policy. On the contrary, the NPPF makes clear that the preparation of a Local Plan is the appropriate vehicle through which to amend Green Belt boundaries, and that the inability to otherwise meet housing needs is justification for makes such changes.</p> <p>4.9 It is notable that the Council previously prepared a Local Plan in the context of the 2021 NPPF, which included limited release of Green Belt, and sought to deliver 5,510 new homes for the Borough between 2018 and 2032, an average of 367 dpa. This Local Plan was examined and found to be sound subject to main modifications, but ultimately withdrawn by the Council. The withdrawn, but sound, Local Plan ('the wLP')'s approach to making alterations to the Green Belt boundary in order to address housing needs was found to be consistent with the relevant national planning policy at that time, which was less permissive to such an approach than the current national planning policy with which the DLP must accord.</p> <p>4.10 In terms of changes to the NPPF and PPG since the wLP, three key aspects merit highlighting:</p>						<p>requires. Even if it could be shown to pass the sequential test, there is a lack of evidence to confirm development would be capable of passing the exceptions test for development in areas of flood risk. To rely so heavily on the delivery of such a development site, fundamental to the DLP's proposed housing strategy, is unjustified and alarming.</p> <p><u>HSE Hazardous Installations Consultation Zone</u></p> <p>The proposals appear to focus significant scale development in the HSE Hazardous Installations Consultation Zone. There are two Upper Tier COMAH (Control of Major Accident Hazard) sites located on Canvey Island. It is unclear if the HSE would consider West Canvey an appropriate location to which to direct significant scale housing growth.</p>	<p><u>Emergency Planning Policy SD8</u> covers Developments near Hazardous Uses. Development proposals within the consultation zone will be assessed in accordance with the Health and Safety Executive (HSE) Guidance who may advise against development on health and safety grounds. The Council will place great weight on the recommendation provided by the HSE. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).</p>	

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											<p>the NPPF is now expressly clear that exceptional circumstances which justify alterations to the Green Belt through a Local Plan include, but are not limited to, where an Authority cannot otherwise meet housing needs; grey belt – a new category of Green Belt land, which does not contribute strongly to purposes (a), (b) or (d) – should be considered as part of a Green Belt review and prioritised for release ahead of other greenfield Green Belt land; the minimum housing requirement for which the Borough needs to plan has increased substantially, strengthening the case that alterations to the Green Belt are necessary.</p> <p>4.11 The Council's Castle Point Green Belt Assessment (July 2025) identifies a number of potential grey belt sites within the Borough. We consider that there are additional grey belt sites this assessment should have identified, as discussed in our Section 6 of this representation. In any case, the key point insofar as concerns Policy SP3 is that there are evidently Green Belt sites that do not strongly contribute to purposes (a), (b) or (d) of the Green Belt and could be utilised to increase housing provision. Even if development of such land would not meet needs in full, it could reduce the shortfall compared to current proposals.</p> <p>4.12 The Council's Housing Capacity Topic Paper 2025 makes reference to Borough's</p>													

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											<p>Green Belt being “heavily constrained...[but] even with potentially unconstrained areas, sustainable accessibility and infrastructure deliverability present significant barrier to development” (page 66). However, the DLP lacks any robust evidence to demonstrate that there are no Green Belt sites subject to such constraints that they cannot sustainably provide homes for the Borough.</p> <p>4.13 For example, in seeking to justify the DLP’s approach, and in respect of transport and sustainable access, the Council’s Housing Capacity Topic Paper 2025 asserts at paragraph 12.9 that sites on the edge of settlements do not have access to services or public transport provision, and that Green Belt sites promoted would not be developed at a density that would enable public transport services to be sustained. At 12.12 it goes on to conclude:</p> <p>“It is therefore appropriate and in accordance with the NPPF to avoid development in the Green Belt as it would not be sustainably located and would impact on traffic capacity on the local and strategic highway network. This is consistent with paragraphs 110 and 115 of the NPPF.”</p> <p>4.14 Even if one were to overlook that edge of settlement sites are not inherently remote from services or public transport opportunities, or that sustainable transport is not limited to public transport, the conclusion fails to</p>												

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											<p>consider potential mitigation measures that might be required. In any case, the Council's own evidence does not support this position adopted by the Housing Capacity Topic Paper – the Green Belt Site Assessment (July 2025) suggests there are Green Belt sites that have been promoted that are capable of being considered suitable from a transport and accessibility perspective and are capable of complying with NPPF paragraphs 110 and 115.</p> <p>4.15 Separately, we note that the Council wrote to Matt Pennycook, the Minister of State for Housing and Planning at MHCLG on 4 April 2025, setting out concerns in terms of the Council's ability to address the minimum housing requirement in the preparation of a new Local Plan; and confirming that the Council considers there is to be significant risk that its proposed approach through the DLP will be found to be unsound when considered against the NPPF. The response from the Minister of State (30 June 2025) made clear that the Council is expected to quickly bring forward a Local Plan that can be found sound. Given this exchange, it is far from clear why the Council has subsequently prepared and published for consultation the DLP in its current form. To proceed to submission and examination of the DLP in its current form would not only engender soundness concerns, but with expectations that the DLP would be found unsound, it</p>												

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											<p>would be a highly questionable use of public resources.</p> <p>Timescales for Delivery</p> <p>4.16 There are concerns with temporal aspects of Policy SP3, in addition to the overall quantum of housing proposed.</p> <p>4.17 Not only will the DLP fail to address local housing needs as per the NPPF, but the strategy will mean the shortage will be particularly acute in the first 10 years of the plan period.</p> <p>4.18 Policy SP3 suggests that in the first five years of the plan period (2026-2031), the DLP will seek to provide for an average of 209 dpa (just 30% of its local housing need); rising to 253 dpa for the period 2031-2036 (37% of its local housing need); and then stepping up significantly, albeit still substantially short of the 686 dpa minimum, to 554 dpa from 2031-2043.</p> <p>4.19 This temporal aspect of Policy SP3 is particularly problematic for the following three reasons.</p> <p>4.20 Firstly, there is an urgent local need for housing, , now – the delivery of homes is not a matter than can simply be deferred until a later date.</p> <p>4.21 Secondly, the PPG is clear that if a housing trajectory is to be stepped, there should be clear justification for doing so and that it must ensure housing needs are met in full in the plan period. In the DLP’s case, neither criterion has been met.</p> <p>4.22 Thirdly, the LHNA identifies that whilst the affordable housing need for the Borough over the plan period totals 3,976</p>											

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											<p>dwelling, there are an is estimated 3,220 households in the Borough currently living in unsuitable housing and are unable to afford their own housing, i.e. the vast majority of the community's affordable housing needs are an immediate need. The DLP failure to plan positively to deliver homes, including affordable housing, in the early part of the plan period will have significant negative social repercussions for the Borough.</p> <p>Deliverability</p> <p>4.23 Policy SP3 places significant reliance on redevelopment of urban sites on Canvey Island in order to achieve its proposed housing figure of 6,196 homes.</p> <p>4.24 3,143 new homes are proposed to be delivered in this manner – 51% of the total for the Borough. Of these, 2,000 homes are proposed to be delivered through redevelopment of land at West Canvey (Policy C4). It is not clear if this site is suitable, available or achievable for development. As the DLP itself notes, the land is currently in use as employment sites and retail park, and is well occupied by a mix of uses.</p> <p>4.25 The DLP suggests the proposed approach will require a density of 150 dph – an extremely high density compared to existing development within the Borough, and one that will necessitate flattened development. It is far from clear if such development could be delivered whilst also providing for a variety</p>													

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											<p>of house types as needed and / or meeting the development management standards the DLP proposes.</p> <p>4.26 Furthermore, the location is within Flood Zone 3 – land at greatest risk of flooding from tidal or fluvial sources. The NPPF is clear on the need to steer development away from such areas, and given that there are options for development in areas of the Borough that are subject to lesser degrees of flood risk, but which have been rejected, the DLP’s approach is not justified in this regard. The DLP does not appear to be supported by a sequential test that could justify such an approach as the NPPF requires. Even if it could be shown to pass the sequential test, there is a lack of evidence to confirm development would be capable of passing the exceptions test for development in areas of flood risk.</p> <p>4.27 Additionally, this area has some of the weakest connectivity and access to sustainable forms of transport relative to other parts of the Borough. It is particularly detached from the Borough’s railway station, for example.</p> <p>4.28 Finally, the proposals appear to focus significant scale development in the HSE Hazardous Installations Consultation Zone. There are two Upper Tier COMAH (Control of Major Accident Hazard) sites located on Canvey Island. It is unclear if the HSE would consider West Canvey an appropriate location to which to</p>												

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											direct significant scale housing growth. 4.29 A number of the DLP's allocations, relied upon to deliver a significant proportion of the new homes proposed, lack evidence of deliverability. The DLP may deliver far fewer homes in actuality than it purports to, exacerbating the already substantial shortfall of proposed provision compared with local housing needs.									
10000004	Agent	Sam	Hollingworth	Rainier Developments c/o Ceres Property	Yes	DH2	No		No		5.1 Policy DH2 seeks to prevent coalescence of Daws Heath, a village located to the east of Thundersley, with neighbouring settlements. 5.2 The policy as proposed is not considered consistent with national policy or justified. Furthermore, it risks undermining potential opportunities to ensure the DLP can be considered positively prepared as defined by the NPPF. 5.3 The policy as currently drafted in the DLP states:		Not Answered	Not Answered	Yes - See attachments	B - updated attachments	Policy DH2 is seeking run directly contrary to the NPPF and PPG, and the clear instruction through these that Green Belt purpose (b) (to prevent neighbouring towns merging into one another) is only relevant in relation to merging of towns, and expressly confirms it is not relevant in respect	The council consider it necessary to provide additional protections to prevent urban sprawl and coalescence and maintain the openness of this area to ensure that the gaps between Daws Heath, and other	N	

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											<p>Development of undeveloped land and intensification of developed land between Daws Heath, and neighbouring settlements will only be supported where it does not result in the coalescence of settlements through a reduction in openness and space or the creation of urbanising effects between settlements.</p> <p>5.4 At paragraph 12.13, the DLP explains that “Although there is Green Belt encircling Daws Heath, it is considered necessary to provide additional protections to prevent urban sprawl and coalescence and maintain the openness of this area”.</p> <p>5.5 The above suggests that the policy is seeking run directly contrary to the NPPF and PPG, and the clear instruction through these that Green Belt purpose (b) (to prevent neighbouring towns merging into one another) is only relevant in relation to merging of towns, and expressly confirms it is not relevant in respect of villages.</p> <p>5.6 The policy as worded fails to allow decision-makers to take a balanced approach to consideration of the issue. As currently worded, the policy could be interpreted by decision-makers as requiring any proposal for development between Daws Heath and neighbouring settlements (as any development that involves a net increase in development could be said to result in some reduction of openness, even if only nominally) to be resisted, regardless of any benefits associated with the</p>						of villages. The policy as worded fails to allow decision-makers to take a balanced approach to consideration of the issue. As currently worded, the policy could be interpreted by decision-makers as requiring any proposal for development between Daws Heath and neighbouring settlements (as any development that involves a net increase in development could be said to result in some reduction of openness, even if only nominally) to be resisted, regardless of any benefits associated with the proposal. The plan provides nothing to suggest that any development of any land between the village and neighbouring settlements would inevitably harm its character; and appears to be based on the false assumption that new development on the edge of settlement would be intrinsically harmful to the character of the village in question.	settlements are maintained to protect its unique identity and semi rural character.	

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											proposal. 5.7 The purported justification as set out in the DLP is that “Engagement through the preparation of the Castle Point Plan has highlighted that residents feel it is vitally important that the unique character of Daws Heath is protected” [12.11] and “Ensuring the gaps between Daws Heath, and other settlements are maintained will protect its unique identity and semi rural character.” [12.14]. Whilst ensuring the protection (or enhancement) of the character of Daws Heath is an appropriate objective, the DLP provides nothing to suggest that any development of any land between the village and neighbouring settlements would inevitably harm its character; and appears to be based on the false assumption that new development on the edge of settlement would be intrinsically harmful to the character of the village in question.											

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1000005	Agent	Sam	Hollingworth	Rainier Developments c/o Ceres Property	Yes	SP3	No		No		<p>6.1 This section of our representation concerns the DLP's site selection process insofar as it concerns site GB14 / (Site ID40101) / Land South of Daws Heath Road, Thundersley ('the Site').</p> <p>6.2 It is noted that the DLP fails to allocate any Green Belt land for residential development. The Council's evidence to support such a stance is highly questionable, given that the wLP was only recently examined, through which it was confirmed that the allocation of multiple sites within the Green Belt was a sound approach. Subsequently, and in the context of the DLP, the Borough's minimum housing requirement is significantly greater; and the NPPF and PPG are clear on both the need to amend Green Belt boundaries where housing needs cannot otherwise be met, and on the need to take a more permissive approach to considering the suitability of allocating Green Belt land for development. In this context, the Council's stance set out in the DLP cannot be justified.</p> <p>Sustainability / Suitability</p> <p>6.3 The Site adjoins the existing residential envelope of a settlement identified as sustainable to accommodate proportionate growth in the current Development Plan. It adjoins existing residential areas.</p> <p>6.4 The Site is not subject to any physical, environmental, ecological or heritage constraints that suggest it would be unsuitable for residential</p>		Not Answered	Not Answered	Yes - See attachments	B - updated attachments	Makes case for the inclusion of Site GB14.	Noted	N

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											<p>development. The Site's only constraint to development is that it is located on land designated as Green Belt in the Development Plan, which dates back to 1998 – a policy constraint, and one shared by the vast majority of land with the potential to contribute to the Borough's needs.</p> <p>6.5 A planning application made in respect of the Site in 2023 (reference 23/0104/OUT) confirmed the suitability of the Site for residential development in terms of a lack of physical, ecological, environmental, or heritage constraints. Such assessment work was reviewed by the relevant statutory consultees and other stakeholders through the consideration of this application.</p> <p>6.6 Application 23/0104/OUT was subject to a non-determination appeal ((APP/M1520/W/23/3329585) which was dismissed on the grounds that the very special circumstances required to justify such development in the Green Belt had not been demonstrated in the case of that specific application.</p> <p>6.7 The Site's potential suitability, availability and achievability was considered through the Council's Strategic Land Availability Assessment (July 2025) (SLAA).</p> <p>6.8 The SLAA considered the site in relation to 24 different suitability criteria. In relation to every one of these, the SLAA suggested the site was suitable. Despite this, the SLAA concludes</p>												

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											<p>the suitability of the Site for residential development is questionable. The justification for this is far from clear.</p> <p>6.9 The SLAA also applies a scoring system through which sites are awarded a value relating to each one of the 24 suitability criteria. The Site scored a total of 61 using this approach, out of a maximum score of 82. This score is greater than several sites that are proposed to be allocated for residential development through the DLP, such as Land to the west of Canvey Island (score of 40); and Manor Trading Estate (score of 58). Whilst it is not considered that the process of determining site allocations can be distilled down to a basic quantitative scoring exercise, these results, the conclusions in respect of the Site's suitability, and the approach to site selection having regard to this is very questionable. Particularly in the context of a DLP which allocates insufficient land to meet housing needs, and claims it is not possible to meet development needs in full.</p> <p>6.10 One of the reasons suggested by the Council's Housing Capacity Topic Paper (2025) as to why the DLP fails to meet the Borough's minimum housing requirement, is the lack of any Green Belt sites that are capable of being considered suitable from a transport or accessibility perspective, in terms of compliance with NPPF paragraphs 110 and 115. The Topic Paper cites the justification for this stance as follows:</p>													

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											<p>“A site level sustainability and accessibility assessment was commissioned to consistently and robustly assess the sustainability of each Green Belt site’s location on the transport network, and to determine through highway design if the site can be accessed by all users in a safe way, considering national design requirements” [12.6]</p> <p>6.11 However, this assessment (Green Belt Site Access Assessment (July 2025)) found that GB14 was one of a small number of Green Belt sites that is capable of being delivered in a manner which accords with NPPF paragraphs 110 and 115. This is consistent with the appeal decision in respect of this site, discussed in Section 3 of this representation, in which no concerns vis-à-vis the site’s residential development and transport, accessibility, or highways impacts were found.</p> <p>6.12 Concerns in terms of how the Site was considered as GB14 through the SA are set out in Section 3 of this representation. They are not repeated here, but are applicable to the soundness of the DLP, as well as relevant to considering compliance with the SEA Regulations.</p> <p>6.13 The Site is sustainable for residential development, as the appeal decision in respect of APP/M1520/W/23/3329585 confirmed.</p> <p>6.14 The Site is evidently suitable for development. Indeed, the Council’s own evidence base effectively concerns this, with the exception of the fact the Site</p>											

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											<p>is on land currently designated as Green Belt. This is discussed below.</p> <p>Green Belt</p> <p>6.15 The last site-specific assessment of the Site's contribution to the Green Belt purposes by the Council was through the Council's Green Belt Boundary Review 2013, in which the following was concluded: "The Green Belt could be redefined in this location using existing field boundaries, tree belts and ancient woodland, and existing residential development, all of which are readily recognisable physical features. "There is some concern over the potential narrowing of the western edge of the Daws Heath Ring part of the Green Belt, however it is considered that a form of development could be achieved in this location, which integrates into the existing landscape and pattern of development in this area. "A redefined boundary would still allow for this part of the Green Belt to fulfil its purposes".</p> <p>6.16 The relevant extract of the Council's Green Belt Review (2013) is provided as Appendix 1.</p> <p>6.17 Separately, as noted above, an appeal for a proposed residential development of the Site ('the 2024 Appeal') was dismissed in 2024, when it was considered that very special circumstances to justify residential development in the Green Belt had not been demonstrated in that instance.</p> <p>6.18 It is important to recognise that, firstly, as confirmed through</p>												

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											<p>the judgment in Compton⁷ the ‘very special circumstances’ test for permitting inappropriate development in the Green Belt is a higher and more demanding test than the ‘exceptional circumstances’ test applied to altering Green Belt boundaries at the plan-making stage.</p> <p>6.19 Secondly, in terms of the Site’s contribution to the purposes of the Green Belt, the appeal decision predated the current NPPF and PPG, and their definition of grey belt and methodology for assessing the contribution to the purposes of the Green Belt.</p> <p>6.20 The NPPF defines grey belt as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of Green Belt purposes (a), (b), or (d) in. The definition excludes land where the application of the policies relating to the areas or assets in NPPF footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.</p> <p>6.21 In relation to purpose (a) (to check the unrestricted sprawl of large built-up areas), Thundersley is a town, and as such constitutes a large built-up area for the purposes of considering the Site’s contribution to the Green Belt.</p> <p>6.22 In the 2024 Appeal decision, the Inspector concluded that: “Woodland would restrict further spread of Thundersley towards Daws Heath. In that sense, the proposal would not lead to totally</p>												

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											<p>'unrestricted' sprawl and the integrity of the wider Green Belt between Thundersley and Daws Heath in serving this purpose would not be wholly undermined by the proposal"8</p> <p>6.23 However, the Inspector went on to opine that: "There would be a close physical link between development on the site and Nos 154-164 and given the proximity, I agree with comments made by the appellants at the Hearing that these bungalows would be 'tied in' with Thundersley and would relate in stronger fashion to it. In my view, the proposal would lead to these dwellings being read and appreciated as part of Thundersley in contrast to the existing impression of a standalone group and consequently the further outward expansion of Thundersley beyond the site. As a result, I cannot agree that the site as a whole is very well contained or that sprawl would be limited to the appeal site as the appellants asserted".</p> <p>6.24 The 2024 Appeal decision predates updates to the PPG that set out how the various levels of contributions to the Green Belt should be assessed. As such it is appropriate to revisit these conclusions in the context of the PPG.</p> <p>6.25 The PPG explains that sites making a strong contribution to this purpose are likely to be free of existing development and lack physical features in reasonable proximity that could restrict and contain development.</p>												

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											<p>6.26 In the case of the Site, it adjoins the existing settlement to its west. To the south and east of the Site, any potential future incursion of development into the Green Belt is prevented by the presence of dense woodland, protected from removal / development by its Ancient Woodland designation. To the north, Daws Heath Road provides a clear boundary of substantial permanence.</p> <p>6.27 There is nothing within the PPG to support the view that a change in the relationship between the existing bungalows at 154-164 Daws Heath Road could constitute harm to purpose (a) of the Green Belt. On the contrary, the PPG now states that where sites lack physical features that could restrict or contain development, such land might be capable of being found to make a strong contribution. In this instance, the existing dwellings to the south of Daws Heath Road, and riding school buildings, evidently provide physical features which act to contain the Site. Furthermore, to the south and east of this neighbouring development, further woodland areas restrict the possibility for any future encroachment into the Green Belt.</p> <p>6.28 A Landscape, Visual and Green Belt Assessment (LVGA) has been prepared which considers a specific proposed development for the Site, including in relation to the current NPPF and PPG on Green Belt. A copy of this LVGA is</p>												

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											<p>provided as Appendix 2. The LVGA assessed the Site's contribution to purpose (a) as weak / none.</p> <p>6.29 Turning to purpose (b) (to prevent merging towns merging into one another) this was evidently a determinative factor in the dismissal of the 2024 Appeal. Specifically, in relation to the separation of Thundersley and Daws Heath. The Inspector in the 2024 Appeal expressly stated (at paragraph 28) that Daws Heath is a village; but noted that the Council's Castle Point Borough Green Belt Review – Part 1 (2018) (GBR) considers Daws Heath as a town.</p> <p>6.30 Subsequently, the PPG has clarified that purpose (b) relates to the merging of towns, and expressly states it is not relevant to villages.</p> <p>6.31 The 2024 Appeal decision stated that Daws Heath was a village. A subsequent appeal decision⁹ (451-469 Daws Heath Road) reaffirmed this view, but in this case expressly in relation to the definition of grey belt.</p> <p>6.32 Consequently, as confirmed in 451-469 Daws Heath Road, purpose (b) of the Green Belt is not relevant to the village of Daws Heath, and thus not relevant to the Site.</p> <p>6.33 In any case, the PPG now confirms that areas which are likely to make a strong contribution to purpose (b) of the Green Belt are likely to be free of existing development, and form a substantial part of a gap between settlements the development of which would be likely to result in</p>											

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											<p>a loss of visual separation of towns.</p> <p>6.34 As the 2024 Appeal Decision confirmed, the gap between the Site and Daws Heath is not free from existing development; and there would be no intervisibility between the proposed development and the edge of Daws Heath.</p> <p>6.35 As such, the Site could not be considered to make a strong contribution to Green Belt purpose (b) and prevention of coalescence between Daws Heath and Thundersley. even if the status of Daws Heath as a village was to be (unreasonably) ignored.</p> <p>6.36 The LVGA assesses the Site's contribution to purpose (b) as weak / none.</p> <p>6.37 In respect of purpose (d), the 2024 Appeal did not suggest the Site made any contribution to this. Very few sites do, as few Green Belts perform the role of preserving the setting or special character of any historic town. Thundersley is not an historic town in this context, and thus the Site cannot make any significant contribution to purpose (d).</p> <p>6.38 The NPPF Annex 2 confirms that the definition of grey belt excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development. These include Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast;</p>												

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											<p>irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest which are demonstrably of equivalent significance to scheduled monuments) and areas at risk of flooding or coastal change. None of these apply to the Site.</p> <p>6.39 Having regard to all of the above, the Site is considered to meet the definition of grey belt.</p> <p>Availability and Achievability</p> <p>6.40 The Site is subject to a lack of any significant constraints to residential development, and does not require any significant additional infrastructure to be brought forward ahead of it providing homes.</p> <p>6.41 An application has been submitted for the residential development of the Site, accompanied by technical assessment work and reports which confirm the suitability of the Site for housing. This further demonstrates the Site's deliverability.</p> <p>6.42 It is being actively promoted by an experienced promoter with the agreement of the landowner. There are no ownership of other legal obstacles to the Site's development for residential use. It is able to accommodate c.58 new homes through a development that would respect its edge of settlement location and the character of the area, and is available and achievable for 50% affordable housing – c.29 affordable homes that would be a significant benefit to the community, particularly in light of the</p>												

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											<p>Borough's acute affordable housing shortage.</p> <p>Overview</p> <p>6.43 In the context of the Borough's housing need and inability to meet this without impinging on the current Green Belt, the NPPF makes clear the need to amend Green Belt boundaries. There are evidently suitable, available and achievable sites for residential development which are currently designated as Green Belt in a very out of date Local Plan. The examination of the wLP confirmed that amending the Green Belt boundary to help address development needs was a sound approach, even in the context of national policy which was much less positive on taking such an approach, as well as the Borough's development requirements being much less than exists today. The DLP's refusal to make any alterations to the Green Belt, despite the NPPF's clear exhortation to do so in these circumstances, and the current boundaries being based on a wholly out of date Local Plan, renders the DLP manifestly unsound.</p> <p>6.44 The Site is sustainable and deliverable for residential development.</p> <p>6.45 It is grey belt land that should be prioritised for allocation through the new Local Plan.</p> <p>6.46 A relatively recent appeal decision confirmed a lack of any constraints to the development of the Site, with the exception of national Green Belt policy as it</p>													

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											<p>then was. This was of course through the development management process, and a more permissive approach should be taken when considering the potential allocation of Green Belt land through the plan-making process. Furthermore, the NPPF and PPG have been amended in terms of how the appraisal of Green Belt for allocation for development should be considered, which results in a very different conclusion when considering the Site's contribution to the purposes of the Green Belt than that reached in respect of the appeal. This stance is supported by a LVGA which accompanies this representation, and which concludes the Site is grey belt as defined by the NPPF and PPG.</p> <p>6.47 The failure of the DLP to allocate the Site should be seen alongside its failure to ensure housing needs will be met, and the acute shortage – particular of affordable homes – the DLP as currently drafted would engender.</p> <p>6.48 The rejection of the Site in this context means the DLP is patently unsound – it is contrary to the NPPF, contributes to the Local Plan's failure to be positively prepared, and its approach is not justified.</p>									

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10000006	Agent	Sam	Hollingerworth	Rainier Developments c/o Ceres Property	Yes	Conclusion	No		No		<p>7.1 The DLP in its current form is evidently unsound.</p> <p>7.2 Its approach to addressing housing need is contrary to the NPPF, and how national policy requires Councils to plan to meet their local requirements. Neither the proposed approach to meeting housing needs, nor the process of considering options in relation to the issue, appear to have given due consideration to the acute and current affordable housing shortage in the Borough.</p> <p>7.3 The DLP's failings in this regard are rendered even more problematic by its proposal to delay delivering homes until towards the end of the plan period, with the proposed shortfall in the early years particularly pronounced. The negative social effects of putting off the provision of homes exacerbated by this delay, given that the vast majority of the Borough's projected affordable housing need is one that currently exists, would be very significant.</p> <p>7.4 Not only is the approach to meeting housing needs fundamentally flawed in quantitative terms, but the spatial approach is considered neither justified nor consistent with national policy.</p> <p>7.5 The bulk of the new dwellings proposed are being directed to an area subject to significant constraints and potentially one of the least sustainable parts of the Borough. Indeed, the deliverability of sites proposed to accommodate a significant proportion of the total number of</p>		Not Answered	Not Answered	Yes - See attachments	B - updated attachments	<p>Considers the plan is unsound.</p> <p>Not meeting housing needs</p> <p>Release Green Belt sites</p> <p>Concern over the SA</p>	<p>Comments noted. These matters have been addressed specifically in each of the policy specific comments</p>	N

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											<p>new homes the DLP's proposes appears highly suspect, particularly at the densities on which the DLP relies. The approach is neither sustainable nor effective.</p> <p>7.6 Additionally, the site selection process is unsound.</p> <p>7.7 There are sites that are sustainable and deliverable to provide new homes in the early years of the plan period, but which have been unduly rejected. This appears to have been the result of a combination of a misapplication of the NPPF's Green Belt policies, and a failure to properly consider available evidence (including through the SA) of sites' suitability to accommodate development. This has included the failure to properly identify grey belt land, including deliverable grey belt sites; or to consider non-grey belt, Green Belt land, if insufficient alternatives to meet development needs are available.</p> <p>7.8 The SA of the DLP, should be a useful tool to help ensure that the DLP is justified and will achieve sustainable development. However, there are substantial flaws in the SA of the DLP. These include failure to properly consider various effects (in particular social effects), failure to consider options on an evidential and objective basis, and a process that appears heavily and unjustifiably skewed towards favouring options which limit development.</p> <p>7.9 .Not only are such defects in the SA a soundness matter, but</p>												

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											<p>the DLP's compliance with the SEA Regulations is also of concern, given the extent and nature of the issues with the SA. 7.10 Separately, it is far from clear from the evidence available whether the preparation of the DLP has met the Duty to Cooperate. There is certainly little evidence that work undertaken to meet the Duty to Cooperate have been effective. Most notably, there is a lack of evidence that the Council has had any meaningful engagement with other Authorities within the housing market area regarding the potential for these neighbours to address the DLP's shortfall in housing provision. 7.11 Our representations on a Local Plan at this stage would usually seek to suggest remedies for the defects they identify. However, such is the extent and nature of the flaws with the DLP, we suggest that it will be very challenging for the Council to address these without fundamental changes. We suspect it will be necessary for the Council to revisit earlier stages in the plan-making process, and prepare a new Regulation 18 iteration of its Local Plan – one which properly considers options which are genuinely capable of forming a sound Local Plan that complies with national policy; and which is supported by robust evidence, including an SA which meets the requirements of the SEA Regulations.</p>													

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088-0001	Individual	Sally	Holman		Yes	SP3	No	Failure to consider strategic alternatives, for example N W Thundersley NO credible 5 year housing land supply	No	Justified, Consistent with national policy	<p>This is NOT consistent with National Policy, it doesn't meet the housing target for Castle Point & the site selection totally ignores Greenbelt / Grey belt against new NPPF guidelines.</p> <p>It's not justified, the site selection strategy is biased & mostly towards a "no greenbelt build policy", it's based solely on the "over development of Brownfield sites" has not considered all sites, with no Greenbelt / Greybelt sites added, and the exclusion of the NW Thundersley Site.</p> <p>I DO TOTALLY agree with the Had2 policy for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation & connectivity, protection as an open space, promoting the heritage site, the Castle and whatever is planned for this site in the future does NOT have a significant impact on the landscape OR the Greenbelt.</p> <p>I ALSO AGREE the Had2 Policy is about protecting this Greenbelt site as NOT SUITABLE for development, but this unsound plan for 6,200 homes, puts the Hadleigh farmland site AT RISK to speculative development, needing planning objections with respect to urban sprawl, it's a buffer zone, the effect on highways & traffic, lack of</p>	<p>ADD NW Thundersley site, 187 Ha, as a Greenbelt, Grey belt, Brownfield site option for 7500 homes.</p> <p>Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, and Hadleigh at 305 Total Housing target of 11,000</p>	No	Not Answered	Not Answered	A	No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	N

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											<p>infrastructure, protecting our farmland & wildlife, out of character, open space, heritage, archaeology, promoting historic links, & use grey belt FIRST. Any development on this site effects both Hadleigh & the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with NO housing development EVER on this farmland site and I really hope the Salvation Army agree with this direction.</p> <p>We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect & enhance a strategic green infrastructure asset between Hadleigh & Leigh on Sea.</p>								common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.	North West	

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																		<p>Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.</p> <p>Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review,</p>	

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																		backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter	

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																		<p>the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Support for HAD2 Noted.</p> <p>A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD3</p>	

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12680001	Individual	June	Hooper			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.				Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)	

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																		<p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u></p>	

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																		Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
12680002	Individual	June	Hooper			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
12	Individual	June	Hooper			C4					The number of Canvey West homes puts residents in the East						Development at West Canvey will impact	The safety of all Castle Point	N

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680003											at risk with emergency evacuation procedures.						emergency evacuation procedures for those residents living at East Canvey	residents is a priority and has been considered within the Castle Point Plan	
1265001	Individual	Peter	Hosier			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.				Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)	

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																	urban homes for Canvey is not resident led	the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered	

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																		under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
12650002	Individual	Peter	Hosier			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								which improves the overall site environment for the local residents.											
12650003	Individual	Peter	Hosier			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
12310001	Individual	Jacqueline	Housoome			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.				Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding,	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)	

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																	<p>SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led</p> <p>realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.</p> <p><u>Consideration of All Sites</u></p> <p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p><u>North-West Thundersley</u></p> <p>Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West</p>		

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																		Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1231-0002	Individual	Jacqueline	Houso			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
12310003	Individual	Jacqueline	Houso me			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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0020001	Individual	Anita	Houser		Yes	SP3	No	I am responding as an individual resident and prefer to send my consultation response rather than complete the confusing online version. My response is in the main body of this email. I have only lived on Canvey [Redacted Personal Information] but it is quite obvious that is unable to sustain any additional building with the current infrastructure. Insurance premiums are already increased due to being a flood risk area and it will be impossible for anyone to evacuate off the Island if there is an emergency. The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity,	No	Positive, Effective, Justified, Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land	Not Stated		No	A	Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. <ul style="list-style-type: none"> Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. Challenges the soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal. Calls for modifications to reduce pressure on Canvey and include North West Thundersley. 	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground <ul style="list-style-type: none"> North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) 	N

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								and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site			robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the	supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.					outlines why North West Thundersley was not preferred. <ul style="list-style-type: none"> • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. 		

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								known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to answer all the questions in the consultation, and would like this			balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the										

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								document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey			same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related									

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								<p>Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility.</p>			<p>to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of</p>									

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								<p>Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal</p>			<p>contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing</p>										

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								safeguards that ensure development is sustainable, justified, and in the public interest.			target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site. The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of												

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											<p>accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure,</p>													

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											<p>all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24-28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green</p>													

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											<p>Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest – and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to</p>												

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											reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.											
0025-0002	Individual	Anita	Houser		Yes	Forward	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its	No	Not Stated			Not Stated		No	A	<ul style="list-style-type: none"> Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution. 	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N			

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								<p>expectation that Statements of Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.</p>											

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06820001	Individual	Lisa	Howard		Yes	SP3	No	<p>The Castle Point Plan Draft does not appear to be legally compliant for several key reasons:</p> <p>Lack of meaningful community engagement: The plan was not prepared in a manner that aligns with the Council's own Statement of Community Involvement. Residents have not been properly consulted on critical aspects such as infrastructure capacity, site deliverability, and the impact on local services. Proposals to redevelop essential community assets (e.g. health centres, police station, fire station, libraries) were not clearly communicated to the public, which contradicts the requirements for transparent consultation.</p> <p>Duty to Cooperate not demonstrably fulfilled: The Plan fails to show sufficient evidence that Castle Point Borough Council has worked collaboratively with Essex County Council, the</p>	No	Positively prepared, Effective, Justified, Consistent with national policy	<p>I do not consider the Castle Point Plan Draft to be sound for the following reasons:</p> <p>Not Positively Prepared: The plan proposes significant housing growth across Castle Point—particularly on Canvey Island—without delivering the critical infrastructure required to support it. The absence of a third access road to Canvey undermines the plan's ability to meet the area's needs sustainably or safely. Infrastructure and transport capacity are already under significant strain and no realistic solutions have been included in the draft. The plan also fails to demonstrate how it has accommodated unmet need from neighbouring areas through agreement or collaboration.</p> <p>Not Justified: The strategy appears to prioritise housing numbers over deliverability, safety, and sustainability. Brownfield sites proposed for redevelopment include vital community infrastructure such as health centres, fire and police stations, and libraries. The plan lacks a clear explanation as to why these sites were chosen over more sustainable or deliverable alternatives. Moreover, there is no clear evidence that alternative strategies—such as lower-density development or infrastructure-first approaches—were adequately considered or consulted on.</p> <p>Not Effective: Many sites</p>	To make the Castle Point Plan Draft legally compliant and sound, the following modifications should be made: 1. Infrastructure Delivery and Access (Policy IN1, SP1): Reintroduce and prioritise the creation of a third access road to Canvey Island as a strategic infrastructure objective within the plan period. Reinstate the Canvey West Access Taskforce to ensure proper delivery oversight and consultation with Essex County Council and the Environment Agency. Explicitly state that no further major residential development on Canvey Island should be approved	No	Not Answered	Not Answered		<p>lack of DTC Lack of Engagement Flood risk Alignment with the LDS Failure to demonstrate deliverability Third road onto canvey needed Lack of consideration for alternative sites Loss of community facilities not supported</p>	<p>DTC Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. The Council has worked collaboratively with all to ensure that the Duty to Cooperate has been met.</p> <p>Engagement Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.</p> <p>Flood Risk The Strategic Flood Risk Assessment provides an overview of flood risk within Castle Point and then provides site specific information for the allocations in the Castle</p>	N

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								<p>Environment Agency, and neighbouring local authorities—especially regarding shared infrastructure, flood risk mitigation, and strategic transport such as a third road access to Canvey Island.</p> <p>Inadequate consideration of flood risk and environmental constraints: Although the plan is accompanied by a Sustainability Appraisal, it does not adequately address the environmental consequences of building on Canvey Island, a known flood-prone area. This is particularly critical given the island's unique geography and drainage infrastructure — its low elevation, high groundwater levels, tidal influence and reliance on pumped discharge — which make infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins ineffective at best and dangerous at worst. These systems</p>			<p>included in the draft are not demonstrably deliverable. Rebecca Harris MP and local stakeholders have pointed out that there is no clear evidence of landowner commitment, infrastructure funding, or timelines to bring sites forward. This undermines the plan's effectiveness over the plan period. Strategic transport priorities—especially a third access road to Canvey—have been ignored or deferred, despite being critical to enabling growth.</p> <p>Not Consistent with National Policy: The plan does not enable genuinely sustainable development as set out in the National Planning Policy Framework (NPPF). Proposals to build in high flood-risk areas—particularly on Canvey Island—without adequate mitigation or investment in drainage infrastructure directly contradict NPPF principles. In addition, the proposed loss of valued community facilities (libraries, healthcare centres, public services) runs counter to national policy on community</p>	<p>until this access is secured and funded.</p> <p>2. Site Allocations and Community Facilities (Policies HO1, SP1): Remove or revise proposals to redevelop key community infrastructure sites (e.g. fire station, health centres, libraries, police station, town centre car parks) listed as “brownfield” without a clearly identified replacement strategy. Ensure the retention and modernisation of essential community infrastructure is included in the plan as a priority, particularly in underserved or isolated areas such as Canvey Island.</p> <p>3. Flood Risk and Climate Resilience</p>						<p>Point Plan and provides recommendations on how to address any flood risk arising through development.</p> <p>Alignment with the LDS To ensure that the plan is supported by a robust evidence base we have had to adjust the timeline to undertake additional work. When these decisions have been made we have updated the LDS to reflect this for transparency. The Council has ensured that the plan has been positively prepared with all necessary work being undertaken to ensure it is robust.</p> <p>Deliverability All the sites allocated within the plan have been promoted through the call for sites process which has</p>	

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								<p>rely on natural infiltration, which Canvey's ground conditions do not support, risking new flooding or groundwater contamination. Swales designed primarily for infiltration could fail under high tide or storm conditions. Any on-site drainage solution that cannot be mechanically discharged or connected into a properly managed and maintained system poses an unacceptable risk. There is insufficient evidence that the Council has complied with the Habitats Regulations or fully assessed flood mitigation and drainage infrastructure in line with these local constraints and legal obligations.</p> <p>Unclear alignment with the Local Development Scheme: The Council's own timetable and approach outlined in the Local Development Scheme have shifted repeatedly, raising concerns about whether the statutory process and timeline</p>				(Policy CC1): Require a full site-specific flood risk and drainage assessment for all proposed development sites on Canvey Island and other flood-prone areas before planning permission can be granted. This must specifically reflect the island's unique constraints — low elevation, high groundwater levels, tidal influence, and reliance on pumped discharge — which render infiltration-based SuDS measures such as soakaways, infiltration trenches, permeable paving reliant on infiltration, and unlined attenuation basins unsuitable and potentially hazardous. Swales designed for							<p>indicated that the site is available for development by the landowner. All other sites are Council owned sites which CPBC has deemed available for development.</p> <p>Third road onto Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey.</p>	

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								<p>have been properly followed.</p> <p>Failure to demonstrate deliverability: Sites have been included in the draft without evidence of deliverability or landowner commitment. This may mislead residents and does not meet legal requirements to present a plan that can be realistically implemented within the identified timeframe.</p>				<p>infiltration would not function effectively under Canvey's tidal and storm conditions. Policy must require that only drainage solutions compatible with the pumped network and capable of mechanical discharge be used, avoiding the inappropriate application of infiltration systems designed for other areas. Strengthen wording to ensure compliance with the Section 19 Flood Report recommendations.</p> <p>4. Housing Delivery (Policy HO1, Appendix A): Reduce the plan period from 20 years to 15 years to avoid unnecessary overestimation</p>						<p>However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.</p> <p>Alternative sites not considered All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the</p>	

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												of housing need and reduce strain on infrastructure. Remove sites from the housing trajectory that lack evidence of landowner commitment or deliverability within the plan period. Include a phased approach to housing delivery tied to infrastructure improvements, ensuring development is not front-loaded before roads, schools, and healthcare capacity are increased. 5. Cross-Boundary Cooperation and Evidence Base (Policy IM1): Provide an updated and transparent Statement of Common Ground showing joint working with Essex County Council, NHS bodies, utility						Sustainability Appraisal (SA). Loss of Community Facilities Policy INFRA1 supports community facilities and safeguards against redevelopment of these without sufficient alternatives provided.	

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												providers, and neighbouring authorities. Include clear timelines, funding plans, and outcome targets for all critical infrastructure (transport, education, health) referenced in the Infrastructure Delivery Plan. 6. Revised Wording (Suggested): Current Policy SP1 – Spatial Strategy (revision proposed): “Development on Canvey Island will only be supported where it is demonstrated that adequate emergency access, flood risk mitigation, and supporting infrastructure are in place and deliverable within the plan period. Strategic development shall not proceed in areas with a								

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												single access route unless a secondary access is secured.”								

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0878-0001	Individual	Sarah	Howard		Yes	SP3	No	I do not believe the Castle Point Plan Draft is legally compliant for several important reasons, which I share as someone who has lived on Canvey Island for many years. - Lack of meaningful community engagement: From what I have seen, residents were not properly involved in the process. Major changes such as proposals to redevelop our health centres, police station, fire station, and libraries were not clearly explained to the public. For people of my age, these facilities are essential daily lifelines, and losing them without clear consultation goes against the Council's own rules on involving the community. - Duty to Cooperate not fulfilled: It is not clear that the Council has worked effectively with Essex County Council, the Environment Agency, or neighbouring local authorities. Issues such as flood defences, drainage, and the desperately needed third road off the Island cannot be	No	Positively prepared, Effective, Justified, Consistent with national policy	From my perspective as a long-term resident, the Plan is not sound for these reasons: - Not Positively Prepared: Too many houses are planned for Canvey without the basic infrastructure to support them. We have waited decades for a third road, yet it is still missing. Even today, ambulances and fire engines often get stuck in traffic. Adding more housing without solving this first puts lives in danger. - Not Justified: The Council seems to be prioritising housing numbers over common sense. They are proposing to redevelop vital community facilities like our health centres, police station, and library. For many older residents, these are the places we rely on the most. Taking them away without proper replacements is unfair and short-sighted. - Not Effective: There is no clear evidence that many of these sites can even be built. We are told there is no proof of landowner agreements or funding. The third access road is always delayed. Without these, the Plan is not deliverable. - Not Consistent with National Policy: The Plan allows homes in flood zones without proper protections, which goes against national rules for safe and sustainable development. It also proposes taking away important services we need for daily life, which contradicts national policy on supporting strong communities.	To make the Plan workable and safe for us, the following changes are needed: 1. A third road for Canvey (Policies IN1, SP1): No more large housing developments should be approved until a third access road is built and funded. 2. Protect community facilities (Policies HO1, SP1): Do not redevelop our fire station, health centres, library, or police station without guaranteed replacements. Older people especially depend on these services. 3. Flood and drainage protection (Policy CC1): Require proper flood and drainage studies before building. Systems like soakaways or infiltration	No	Not Answered	Not Answered		Lack of meaningful engagement Duty to cooperate not met Flood Risk on Canvey LDS changes Deliverability Third road to Canvey Loss of Community Facilities	Lack of meaningful engagement Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement. Duty to Cooperate Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. The Council has worked collaboratively with all to ensure that the Duty to Cooperate has been met. Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The	N

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								<p>handled in isolation. Without strong cooperation, the Plan cannot be legally compliant.</p> <p>- Flood risk and drainage problems: Canvey Island is unique. We sit below sea level, rely on pumps to stay dry, and experience high groundwater and tidal conditions. I have personally seen the flooding here and know that systems like soakaways, infiltration trenches or permeable paving will not work on this Island. They could even make flooding or contamination worse. Any drainage solution must be compatible with Canvey's pumped system, or it will put people at risk. I do not believe the Plan reflects these realities.</p> <p>- Unclear timetable: The Local Development Scheme has been changed several times, making it hard to see if the Council is following the proper legal process.</p> <p>- Deliverability: Some of the proposed sites have no clear landowner support. Including such sites misleads residents and</p>				<p>trenches do not work here because of the tides, high groundwater, and reliance on pumps. Only drainage solutions proven to be safe for Canvey should be allowed.</p> <p>4. Housing delivery (Policy HO1, Appendix A): Reduce the overall plan period and housing numbers so infrastructure can keep up. New homes should only be built after improvements to roads, schools, and health services are in place.</p> <p>5. Cooperation (Policy IM1): Show clear agreements with Essex County Council, the NHS, and others to deliver roads, drainage, health, and education infrastructure.</p> <p>6. Revised</p>						<p>recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.</p> <p>LDS Changes In order to be thorough in producing a robust evidence bases unfortunately the council has experienced</p>	

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								does not meet the legal requirement to show the Plan can actually be delivered.				wording (Policy SP1): No development on Canvey should go ahead unless safe access, flood protection, and services are proven to be in place and deliverable within the Plan period.						some delays which has effected the timetable. The council has endeavoured to update the LDS whenever a delay became apparent to maintain transparency. Deliverability All sites included within the plan were submitted by the landowner due to call for sites and/or is owned by the council. Third Road to Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is	

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																		only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	

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																		Loss of Community Facilities Policy INFRA1 states that redevelopment of existing community uses will only be supported if: a. The utility and function of the community use is improved; b. The community use is located in the same, or a more sustainable location; c. The site makes the best use of urban land in the Borough	

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0879-0001	Individual	Douglas	Howard		Yes	SP3	No	The Castle Point Plan Draft is not legally compliant for these reasons: - Lack of community engagement: The consultation fell short of the Council's own Statement of Community Involvement. Residents were not properly informed about proposals affecting health centres, libraries, and emergency services. That level of consultation does not meet legal standards. - Duty to Cooperate: The Draft Plan fails to demonstrate meaningful collaboration with Essex County Council, the Environment Agency, and neighbouring councils. Issues like a third access road, flood defences, and drainage cannot be addressed by Castle Point in isolation. - Flood risk inadequately addressed: The Plan does not account for Canvey's unique conditions—low elevation, high groundwater, tidal influence, and reliance on pumps. Infiltration-based SuDS	No	Positively prepared, Effective, Justified, Consistent with national policy	The Draft Plan is not sound for these reasons: - Not Positively Prepared: It proposes significant housing growth on Canvey without providing the critical infrastructure needed, particularly a third access road. The Island's transport system is already overstretched. - Not Justified: Proposals target community infrastructure sites such as health centres, fire and police stations, and libraries. These are essential, and the Plan does not justify removing them or show why better alternatives weren't considered. - Not Effective: There is no evidence of landowner commitment or infrastructure funding. Without these, sites are not deliverable. The third road remains unresolved, making the Plan ineffective. - Not Consistent with National Policy: Building in flood-prone areas like Canvey without robust mitigation contradicts the NPPF. Removing vital community services also conflicts with national policy on supporting healthy, resilient communities.	The following changes are required: 1. Third access road (Policies IN1, SP1): No further major development should be allowed until a third access road to Canvey is fully funded and delivered. 2. Protect facilities (Policies HO1, SP1): Do not redevelop fire, health, library, or police facilities unless like-for-like replacements are secured. 3. Flood resilience (Policy CC1): All development must be supported by site-specific flood risk and drainage assessments. Infiltration-based SuDS are unsuitable for Canvey. Only pumped or mechanical systems that work with the Island's drainage	No	Not Answered	Not Answered		Lack of meaningful engagement Duty to cooperate not met Flood Risk on Canvey LDS changes Deliverability Third road to Canvey Loss of Community Facilities	Lack of meaningful engagement Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement. Duty to Cooperate Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. The Council has worked collaboratively with all to ensure that the Duty to Cooperate has been met. Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The	N

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								(soakaways, trenches, permeable paving) are unsafe here. Without drainage solutions linked to the pumped network, the Plan does not meet legal compliance. - Local Development Scheme: The timetable has been changed several times, raising concerns about whether the statutory process is being followed correctly. - Deliverability: Some housing sites have no confirmed landowner support or evidence of delivery. Including undeliverable sites undermines the legal requirement to present a realistic Plan.				should be approved. 4. Housing delivery (Policy HO1, Appendix A): Shorten the plan period and reduce housing numbers to realistic levels. Phase delivery so homes are only built once supporting infrastructure is in place. 5. Cooperation (Policy IM1): Provide an updated Statement of Common Ground with Essex County Council, the NHS, and others, showing clear commitments for transport, drainage, education, and health. 6. Revised wording (Policy SP1): Development on Canvey must not proceed without confirmed emergency access, flood defences, and infrastructure						recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. LDS Changes In order to be thorough in producing a robust evidence bases unfortunately the council has experienced	

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												in place within the Plan period.						<p>some delays which has effected the timetable. The council has endeavoured to update the LDS whenever a delay became apparent to maintain transparency.</p> <p>Deliverability All sites included within the plan were submitted by the landowner due to call for sites and/or is owned by the council.</p> <p>Third Road to Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is</p>	

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																		only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	

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																		Loss of Community Facilities Policy INFRA1 states that redevelopment of existing community uses will only be supported if: a. The utility and function of the community use is improved; b. The community use is located in the same, or a more sustainable location; c. The site makes the best use of urban land in the Borough	

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11370001	Individual	Edward	Howard			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	We consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					Plan is unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Consideration of All Sites</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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																		<p>All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding</u></p>	

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																		Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1137-0002	Individual	Edward	Howard			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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11370033	Individual	Edward	Howard			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
02530001	Individual	Karen	Howe		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. As well as all the jargon Canvey is already overpopulated, should the Oikos aviation fuel terminal fail this would be a bigger disaster than Buncefield! The local councillors admitted to me at the meeting there are no evacuation planes in place for Canvey!! One little car crash and the island comes to a	PROPOSED MODIFICATION : Add North West Thundersley site.	Not Stated		No	A	Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic

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											stand still. The site is right next to a site of Special Scientific Interest- one of only two in the world! How will this effect the endangered species on this site with extra pollution a potential 6,000 plus extra cars will cause?!! Very disappointed in Castle Point Council!!						East at risk with emergency evacuation procedures. Highlight the risks of the Oikos aviation fuel termina. Concerned tha their are no evacuation planes in place for Canvey.	Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Emergency Planning Policy SD8 covers Developments near Hazardous Uses. Development proposals within the consultation zone will be assessed in accordance with the Health and Safety Executive (HSE) Guidance who may advise against development on health and safety grounds. The Council will	Flood Risk Assessment (SFRA).

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																		place great weight on the recommendation provided by the HSE. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	
02530002	Individual	Karen	Howe		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
03280001	Organisation	Sue	Howe	HSE		Forward	Not Stated	HSE is not a statutory consultee for local and neighbourhood plans. If there is a nuclear installation within or nearby your local plan area we recommend you contact the Office of Nuclear Regulation. HSE has provided Local Planning Authorities (LPAs) with access to its LUP Web App https://pa.hsl.gov.uk/ and downloadable GIS consultation zones. These tools alongside HSE's published methodology (https://www.hse.gov.uk/landuseplanning/methodology.htm) can	Not Stated	Not Stated						A	HSE is not a statutory consultee for local and neighbourhood plans. If there is a nuclear installation within or nearby your local plan area we recommend you contact the Office of Nuclear Regulation. HSE has provided Local Planning Authorities (LPAs) with access to its LUP Web App https://pa.hsl.gov.uk/ and downloadable GIS consultation zones. These tools alongside HSE's published methodology (<a 920="" 940"="" 950="" 980="" data-label="Page-Footer" href="https://www.hse.gov.uk/landuseplanning/met</td> <td>Noted</td> <td>N</td> </tr> </tbody> </table> </div> <div data-bbox="> <p>1142</p> 		

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								assist you in ensuring that land allocations do not conflict with major hazard sites and pipelines, licenced explosives sites and nuclear installations. Your attention is drawn to the planning policy guidance provided by your central planning departments in England, Scotland and Wales. For England: https://www.gov.uk/guidance/hazardous-substances-in-particular-paragraphs-65-to-69-which-explain-an-LPAs-responsibilities-when-taking-public-safety-into-account-in-planning-decisions-and-formulating-local-plans . For Scotland: https://www.gov.scot/publications/circular-3-2015-planning-controlshazardous-substances/pages/2/Annex F For Wales: https://www.legislation.gov.uk/wsi/2015/1597/contents/made										hodology.htm) can assist you in ensuring that land allocations do not conflict with major hazard sites and pipelines, licenced explosives sites and nuclear installations. Your attention is drawn to the planning policy guidance provided by your central planning departments in England, Scotland and Wales. For England: https://www.gov.uk/guidance/hazardous-substances-in-particular-paragraphs-65-to-69-which-explain-an-LPAs-responsibilities-when-taking-public-safety-into-account-in-planning-decisions-and-formulating-local-plans . For Scotland: https://www.gov.scot/publications/circular-3-2015-planning-controlshazardous-substances/pages/2/Annex F For Wales: https://www.legislation.gov.uk/wsi/2015/1597/contents/made		
095800	Individual	Philip	Howe	The People's Independent	Yes	SP3	Yes		Yes		I strongly support the Plan's strategy to meet housing needs primarily through brownfield regeneration and urban capacity optimisation, thereby upholding the strong		Not Answered	Not Answered	Yes		I strongly support the Plan's strategy to meet housing needs primarily through brownfield regeneration and	Support noted.	N	

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01				ent Party							community commitment to protecting the Green Belt. This demonstrates the Council has been positively prepared and has appropriately responded to the strong direction in the revised NPPF to be ambitious with brownfield land and avoid Green Belt release where possible.						urban capacity optimisation, thereby upholding the strong community commitment to protecting the Green Belt. This demonstrates the Council has been positively prepared and has appropriately responded to the strong direction in the revised NPPF to be ambitious with brownfield land and avoid Green Belt release where possible.		
0958-0002	Individual	Philip	Howe	The People's Independent Party	Yes	C1	Yes		Yes		The Plan is effective because Policy C1 (Canvey Town Centre Master Plan) provides a comprehensive, phased strategy for regeneration. This master-planning approach, which includes a clear 'Investment Proposition' and 'Delivery Plan,' demonstrates a proactive, market-facing approach that is already proving successful by attracting the £20 million Long-Term Plan for Towns funding. This makes the Plan highly deliverable.		Not Answered	Not Answered	Yes		Supports the Castle Point Plan and Policy C1	Support noted.	N
0958-0003	Individual	Philip	Howe	The People's Independent Party	Yes	SP4	Yes		Yes		I support Policy SP4 (Development Contributions), which provides the necessary framework to secure financial and physical contributions from developers. This policy ensures that new growth will pay for the essential supporting infrastructure (e.g., roads, education, healthcare) and is a robust mechanism to ensure the Plan is effective and does		Not Answered	Not Answered	Yes		I support Policy SP4 (Development Contributions), which provides the necessary framework to secure financial and physical contributions from developers. This policy ensures that new growth will pay for the essential supporting infrastructure (e.g.,	Support noted.	N

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											not place an unfair burden on existing residents.						roads, education, healthcare) and is a robust mechanism to ensure the Plan is effective and does not place an unfair burden on existing residents.		
09580004	Individual	Philip	Howe	The People's Independent Party	Yes	T1	Yes		Yes		The Transport Strategy (Policy T1) is consistent with National Policy by prioritising walking, cycling, and public transport through the creation of Mobility Hubs and requiring contributions to alleviate congestion. This integrated approach is essential to achieving net-zero ambitions and mitigating the impacts of growth on the Borough's highly constrained road network.		Not Answered	Not Answered	Yes		The Transport Strategy (Policy T1) is consistent with National Policy by prioritising walking, cycling, and public transport through the creation of Mobility Hubs and requiring contributions to alleviate congestion. This integrated approach is essential to achieving net-zero ambitions and mitigating the impacts of growth on the Borough's highly constrained road network.	Support noted.	N
09580005	Individual	Philip	Howe	The People's Independent Party	Yes	Foreword	Yes		Yes		I believe the Council has been positively prepared due to the high level of community engagement throughout the plan's preparation. The final draft clearly reflects the overwhelming community preference for a brownfield-first strategy and targeted investment in town centres, which validates the Council's approach.		Not Answered	Not Answered	Yes		Support for the plan and that it represents the outcomes of the consultations and reflects what the local community has asked for.	Support noted.	N
0958000	Individual	Philip	Howe	The People's Independent Party	Yes	SP3	Yes		Yes		I support the Council's approach to determining the housing requirement. The strategy to focus delivery within the existing urban footprint, rather than relying on unsustainable Green Belt sites, is the most		Not Answered	Not Answered	Yes		I support the Council's approach to determining the housing requirement. The strategy to focus delivery within the existing urban	Support noted.	N

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06											appropriate and Justified response given the severe physical and environmental constraints of the Borough, including high flood risk and limited highway capacity.						footprint, rather than relying on unsustainable Green Belt sites, is the most appropriate and Justified response given the severe physical and environmental constraints of the Borough, including high flood risk and limited highway capacity.		
09860001	Individual	Lynne	Howe		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
10880001	Individual	Chelsea	Howell		Yes	HAD4	No	No notice given to roads that will be affected by this housing, i.e. a lot more traffic on the road, less likely to get an appointment in the doctors surgery. Just want to make you all aware of the high impact building more houses in Hadleigh will have on traffic, school places, doctor surgery places, and the safety of this area. I moved from an area that was starting to go downhill, we chose Hadleigh because it's safe, quiet and it's a lovely area to bring my	No	Positively prepared		To not use this land, or any land in Hadleigh for housing. I moved here to be away from the busyness, and would hate for it to become like any other town where it's overrun with people and cars.	No	Not Answered	Not Answered	B	Objects to HAD4 because: Traffic Infrastructure Density Don't build on salvation army land	Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will	N

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								<p>baby up in. We take walks over to the Castle and the Salvation army land and would hate to see that land go to waste by more houses being built for no reason.</p> <p>I'm not sure if this is the correct way to voice my opinion, nonetheless, I hope you take this into consideration.</p>										<p>also have to comply with T5 to ensure sufficient highway impact mitigation.</p> <p>Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).</p> <p>The salvation army land is allocated green belt and is not included for development within this plan</p>	
1015001	Individual	Lilly	Howlett		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1016001	Individual	Emma	Howlett		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N

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10170001	Individual	Gar eth	How lett		Yes	Who le Plan	Yes		Ye s				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
1100001	Individual	Gar eth	How lett		Yes	Who le Plan	Yes		Ye s				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N

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0507-0001	Individual	Dennis	Huckle		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park H031. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped	N

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											evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.	Strategic alternatives North west	

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																		<p>Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p>Green/Grey Belt The Council has</p>	

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																		undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the	

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																		<p>impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergen</p>	

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																		<p>cyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation</p>	

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																		Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0507-0002	Individual	Dennis	Huckle		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing	N

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																		<p>commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025).</p> <p>Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt.</p> <p>That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the</p>	

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																		Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.		
0507-0003	Individual	Dennis	Huckle		Yes	Fore word					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.						A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	Comments noted. The council has prioritised inclusivity for the consultations.	N
1069-000	Individual	Julia	Huckle		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N	

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01																			
1341-0001	Individual	D	Huckle			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1341-0002	Individual	D	Huckle			SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			No five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex	

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																		therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply	and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		<p>position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt</p>	

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																		<p>The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to;</p> <p>Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point,</p>	

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																		<p>Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in</p>	

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																		relation to Canvey. SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1341003	Individual	D	Huckle			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0451001	Individual	Jacob	Hudson		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N

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0479-0001	Individual	Susan	Huggett		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No		All	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0650-0001	Individual	Caroline	Hughes		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0795-0001	Individual	Kevin	Hughes		Yes	SP3	No	This is green belt, rebranded to suit your purposes. There is also no supportive infrastructure, which I am sure the govt said must be built to facilitate the scale of build and impact	No	Effective, Consistent with national policy	The govt said that, even if you conveniently decide to rebrand green to grey belt, it does not mean you just go ahead and build on it. Also, even Essex water suppliers have challenged the soundness of this. Conveniently ignore which of these you like. I fear anything said of residential concern will be ignored, but hey, you were told! Also, this is very disproportionate, happy to have more homes, but putting a massive percentage in one flood risky area is -. Unfair and 2. Short term 3. Shows lack of thinking in location support, schools, medical capability, no traffic consultation with highways agency, serious impact on the existing residents ability to get on and off the island	Put water and sewage infrastructure in place to ensure existing annual water plain rise impact are not made worse. Every year in Charfleets / Dutch Village area you have to bring in drainage experts to reduce the road and home flooding. Also, road infrastructure is already significantly challenged. Even 1000 new homes is at least 1000 new cars, the island will not cope.	Yes	Not Answered	Not Answered		No building on Green/Grey Belt Infrastructure Flood Risk on Canvey	No building on Green/Grey Belt This plan does not include any development on Green/Grey Belt land. The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered	N

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												But I suspect decision makers are not personally impacted. Other mainland areas can cope much better with high volume build. They should take most of the hit						together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.	

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																		<p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).</p> <p>Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the</p>	

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																		overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	

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1000001	Individual	Alan	Hughes		Yes	SP3	No	I do not have the specific knowledge to comment	No	Positively prepared, Effective, Justified	<p>I do not consider that it meets the needs of the Area. The plan suggest the vast majority of new homes to be built on Canvey Island. Ever since I have lived here there have only been surveys that have stated how unprepared we are for the current population on Canvey, The roads are under stress from the increase in numbers and traffic evidenced by the poor road quality . The traffic flow increases every year therefore the traffic flow slows down every year , as witnessed by the traffic jams around and off the Island - such as Long Road and all school areas.</p> <p>Lack of parking areas or street parking again impedes traffic flow.</p> <p>The sewerage on Canvey is dire as the pipework is undersized and at breaking point. the pipework is 3 inches diameter and blocks frequently in certain areas especially Orange Road to name but one .</p> <p>I,m informed by an employee of Anglia Water. that the new developments do use 6 inch pipework but as soon as that pipework reaches the main sewer it has to join the 3 inch network and actually exacerbates the existing problem .</p> <p>Floods . On West Canvey when they created the new cemetery the water table was so high it was difficult to inter the coffins and installation of gravestones impossible.</p>		No	Not Answered	Not Answered		Traffic Infrastructure Flooding on Canvey	<p>Transport The plan has been subject to detailed Transport Assessment, assessing impacts and recommending local interventions. These are identified in the Infrastructure Delivery Plan. Alongside this, the Local Transport Authority, Essex County Council, have prepared the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex includes wider local improvements to transport networks in and around Castle Point, including improved linkages to other areas. Growth in Castle Point will facilitate the delivery of the proposals in the Local Transport Plan 4.</p> <p>Infrastructure Infrastructure matters</p>	N

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											<p>Constructing new industrial units there sounds good on paper but has a survey been carried out to assess the extra cost and increased insurance premiums to operate within this area. I understand why this area is appealing to build on but who is going to set up there. By building on Charfleets and Manor Trading estate where will the current employees find employment. Or are they just expected to claim benefits, increasing my council taxes.</p> <p>Law and Order We are currently being protected by cardboard policemen lurking inside shops. I have not seen actual policeman patrolling for years. This has enabled the creation of youth gangs to destroy buildings, painting walls, chop down trees and generally destroying their environment, this will only get worse . Since the last influx of people onto Canvey has resulted in people wandering around with apparently nothing to do.</p>												<p>(including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).</p> <p>Flooding on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is</p>	

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																		covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	
1390001	Individual	Connor	Hughes		Yes	Whole Plan	Yes	I support the Castle Point Plan Draft I consider the Draft Plan to be legally compliant	Yes		I consider the Draft Plan to be sound.						Castle Point Plan is sound and legally compliant,	Support Noted	N
0886001	Individual	Steve	Hulbert		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N

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0591-0001	Individual	Shelley	Hull		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped	N

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											evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.	Strategic alternatives North west	

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																		<p>Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p>Green/Grey Belt The Council has</p>	

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																		undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the	

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																		<p>impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergen</p>	

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																		<p>cyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation</p>	

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																		Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0591-0002	Individual	Shelley	Hull		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing	N

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																		<p>commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025).</p> <p>Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt.</p> <p>That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the</p>	

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																		Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.		
0591-0003	Individual	Shelley	Hull		Yes	Fore word					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.						A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N
1328-000	Individual	Shelley	Hull			Hou 5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N	

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01											development which improves the overall site environment for the local residents.								
13280002	Individual	Shelley	Hull			SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			No five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).	

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																		land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic	

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																		<p>paper.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments</p>	

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																		guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of	

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																		<p>additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to Canvey. SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site</p>	

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																		circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
13280003	Individual	Shelley	Hull			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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0607-0001	Individual	Doreen	Hunablene		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped	N

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											evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.	Strategic alternatives North west	

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																		<p>Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p>Green/Grey Belt The Council has</p>	

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																		undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the	

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																		<p>impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergen</p>	

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																		<p>cyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation</p>	

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																		Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0607-0002	Individual	Doreen	Hunnabe		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing	N

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																		<p>commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025).</p> <p>Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt.</p> <p>That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the</p>	

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																		Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.		
0607-0003	Individual	Doreen	Hunabl e		Yes	Fore word					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.						A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N
1355-000	Individual	Doreen	Hunabl e			Hou 5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N	

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01											development which improves the overall site environment for the local residents.								
135-0002	Individual	Doreen	Huntable			SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			No five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).	

I D R ef	Individual/ Organisatio n/Agent?	Firs t Na me	Last Nam e	If orga nisat ion - nam e	Has agreed to public ation of Name/ Comm ents?	Poli cy/P ara No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a . So und ?	3b. Positive/Effect ive/Justified/C onsistent?	3c. Explanation	4. Suggested modifications	5. Wis h to part icip ate in exa m	6. Why ?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																		<p>land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic</p>	

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																		<p>paper.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments</p>	

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																		guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of	

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																		<p>additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to Canvey. SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site</p>	

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																		circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
135-0003	Individual	Doreen	Huntable			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
0433-0001	Individual	Elizabeth	Hunt		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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0364-0001	Individual	Gilbert	Hurree		Yes	Whole Plan	Yes		Yes								Castle Point Plan is sound and legally compliant,	Support noted.	N
0367-0001	Individual	Kathleen	Hurree		Yes	Whole Plan	Yes		Yes								Castle Point Plan is sound and legally compliant,	Support noted.	N
0411-0001	Individual	David	Hurrell		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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05900001	Individual	Julie	Hutton		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped	N

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											evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.	Strategic alternatives North west	

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																		<p>Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p>Green/Grey Belt The Council has</p>	

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																		undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the	

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																		<p>impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergen</p>	

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																		<p>cyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation</p>	

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																		Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
05900002	Individual	Julie	Hutton		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing	N

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																		<p>commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025).</p> <p>Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt.</p> <p>That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the</p>	

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																		Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0590003	Individual	Julie	Hutton		Yes	Foreword					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N
133600	Individual	Julie	Hutton			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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01											development which improves the overall site environment for the local residents.								
13360002	Individual	Julie	Hutton			SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			No five year housing land supply North West Thundersley shgould have been included Approach to Green/Grey Belt NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).	

I D R ef	Individual/ Organisatio n/Agent?	Firs t Na me	Last Nam e	If orga nisat ion - nam e	Has agreed to public ation of Name/ Comm ents?	Poli cy/P ara No.	2a. Leg ally Co mpl iant ?	2b. If No, explanation	3a . So und ?	3b. Positive/Effect ive/Justified/C onsistent?	3c. Explanation	4. Suggested modifications	5. Wis h to part icip ate in exa m	6. Why ?	Sup port ing Evid enc e sup plie d?	Opti on A, B or C	Summary	Officer Response	Mods Required
																	<p>land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic</p>		

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																		<p>paper.</p> <p>North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments</p>	

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																		guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of	

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																		<p>additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to Canvey. SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site</p>	

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name/Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sounded?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																		circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
13360003	Individual	Julie	Hutton			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
13380001	Individual	Steve	Hutton			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.		No				Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1338002	Individual	Steve	Hutton			SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			No five year housing land supply North West Thundersley should have been included Approach to Green/Grey Belt NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).	

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																		<p>common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.</p> <p>North West</p>	

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																		<p>Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by</p>	

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																		strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local	

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																		<p>highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to Canvey. SUDs Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS</p>	

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																		design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1338-0003	Individual	Steve	Hutton			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures		No				Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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0497-0001	Individual	Jackie	Hyde		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped	N

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											evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.	Strategic alternatives North west	

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																		<p>Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p>Green/Grey Belt The Council has</p>	

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																		undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the	

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																		<p>impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergen</p>	

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																		<p>cyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation</p>	

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																		Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0497-0002	Individual	Jac kie	Hyd e		Yes	Hou 5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing	N

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																		<p>commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025).</p> <p>Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent of the Green Belt.</p> <p>That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the</p>	

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																		Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.		
0497-0003	Individual	Jackie	Hyde		Yes	Foreword					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.						A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N

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0537-0001	Individual	Shirley	Hymas		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park H031. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped	N

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											evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.	Strategic alternatives North west	

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																		<p>Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.</p> <p>Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).</p> <p>Green/Grey Belt The Council has</p>	

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																		undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the	

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																		<p>impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.</p> <p>Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.</p> <p>Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergen</p>	

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																		<p>cyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation</p>	

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																		Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0537-0002	Individual	Shirley	Hymas		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing	N

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																		Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
0537-0003	Individual	Shirley	Hymas		Yes	Foreword					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N

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05960001	Individual	Michael	Hymas		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped	N

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0596-0002	Individual	Michael	Hymas		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing	N

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0596-0003	Individual	Michael	Hymas		Yes	Fore word					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.						A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	Comments noted. The council has prioritised inclusivity for the consultations.	N
1041-000	Individual	Samantha	Hynes		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N	

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