



Regulation 19 Consultation Spreadsheet
Representations and Responses to the Castle Point Plan
Ordered by Surname Q - X

January 2026

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
0750 - 0001	Individual	Sean Douglas Brian	Quarmermaine	N/A	Yes	C4	No	S.4 of the Castle Point Statement of Community Involvement 2020 states that, subject to reasonable cost and time constraints, safe and effective engagement methods would be utilised. The overwhelming majority of people on Canvey did not know about the Issues & Options consultation or this Regulation 19 consultation. The former was advertised on social media (most	No	Effective, Justified, Consistent with national policy	Effective - this plan is not deliverable due to its reliance upon C4 West Canvey Employment area. The suggestion to simultaneously increase the floorspace for commercial/industrial use as well as redesignate a large enough area to add thousands of dwellings is not clearly explained. More specifically, it is not explain what the new layout of this large area would be, who would pay for it, what happens to the existing businesses, and more. This is not a durable proposal. Consistent with national policy - C4 West Canvey Employment area is not a sustainable development for economic reasons. It severely limits the available area for expansion of commercial/industrial areas whilst simultaneously the plan is reducing such areas (e.g. Canvey Supply) elsewhere in the plan. The last local plan (1998-2003) designed the land for employment some of which was only developed much later on. This change of designation relies upon the unrealistic hope that the layout of the commercial/industrial units might change and that they might not actually use the current surplus land in the future. It also Creates a long-term inefficiency in planning on Canvey Island and would force encroachment on the green belt for the next local plan. Justified - North-West Thundersley (Blinking Owl) is a	Legal Compliance: 1) Immediately get information on the consultation posted to every residence in Castle Point. 2) Provide clear alternatives to the online form for residents to raise comments, suggestions, and objections. Sound: 3) Remove C4 West Canvey employment area from the draft plan. 4) Add North-West Thundersley to the draft plan, maximise residential	No	Not Answered	Not Answered		Lack of publication of the consultation Concerned about the redevelopment of Charfleets Suggesting North West Thundersley as an alternative	Consultation advertisement Comments noted. The council has prioritised inclusivity for the consultations and has advertised the consultations through numerous mediums and platforms. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement. 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'. This policy will apply until such time as a master plan for West Canvey has been developed. Policy E1 may subsequently change in terms of its approach to Charfleets when the	N

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								residents wouldn't see it), within an advertising booklet (even if received, most people never read these), and some people on Canvey received a bespoke booklet just focusing on the plan (brilliant method, should have been used for Reg. 19 too!) but it was not clear on the front of this booklet that this related to mass development so most people would not know the value of engagement as demonstra			far more reasonable and appropriate location. It can facilitate large-scale residential development which alone could exceed the borough's objectively assessed needs whilst minimising the severe infrastructure problems which overdeveloping Canvey would cause, especially to the road network and inevitable pressures on Canvey's sole exit bottle-neck for private and public vehicles to use at Waterside Farm roundabout. The council instead should have maximised the development potential for North-West Thundersley which would allow a longer-term Local Plan to be enacted and more certainty given to property developers for what can be built in Castle Point.	allocation s there, provide the obvious infrastructure connections on the A127, A1245, and A130 (I would suggest another roundabout near the Rayleigh Spur where the current slip road is, or underpasses/flyovers) as well as other reasonable connections.						Castle Point Plan is reviewed in 5 years' time, to enable the delivery of the West Canvey regeneration. 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.	

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								ted by the extremely low response rate. Also, there was a severely disproportionately low number of engagement sessions booked for Canvey Island relative to its population . The latter seems only to have been advertised on social media, and with less than 3 weeks to go before the consultation closes it seems clear this is deliberate so that Canvey residents are not aware of the new addition after the											

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								last consultation to add thousands of extra flats to the plan just for Canvey. It is not reasonable or appropriate to expect residents to do the council's job for it to raise awareness of the consultation. Also, the consultation form is difficult for less technically-able people to use, and due to the lack of proper information being sent to residents it is not clear what alternative methods there are to provide a											

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								consultation response. This failure to use effective methods of consultation mean the council has failed the to carry out the drafting of the plan in compliance in line with its Statement of Community Involvement.											
1023 - 0001	Individual	sean	quaraine snr.		Yes	C4	No	i only heard about this through my son everyone should have been contacted.	No	Positively prepared, Effective, Justified	how can it be fair to put thousands of houses on canvey we dont have the infrastructure to cope. what about the schools, doctors and roads?? canvey is the wrong place to build this many houses its wrong and we all know you wont build any new roads to make it worse its awful getting off canvey in the morning already you should build new towns in north essex instead or if not build it next to the motorway not canvey.	dont build that much on canvey its not fair on us why should we take all of benfleets housing needs. build them somewhere that has proper access to roads. and why build it all	No	Not Answered	Not Answered	A	no building on canvey concern for loss of jobs on charfleets	Comments noted Loss of jobs on charfleets Policy C4 includes a 10% increase on commercial floorspace and does not encourage the loss of jobs	N

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												around charfleets we need jobs on canvey too.							
1361 - 0001	Individual	S	Rabey			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
1361 - 0002	Individual	S	Rabey			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	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	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	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

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												the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	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 point onwards. For further information please see housing topic paper.	the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		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. 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,	

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																		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. 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. Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to Canvey.	

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																		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.	
1361 - 0003	Individual	S	Rabey			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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1203 - 0001	Individual	Barbara	Radley			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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1161 - 0003	Individual	Jean	Raeside			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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0346 - 0001	Individual	Christine	Rands			SP3					For the attention of: CPBC Planning department Policy reference/name: SP3 / C4 Page number: 25-26 / 40-41 Paragraph number: 6.32-6.35 / 8.33-8.40 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. 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					A	Objections on: • 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. • North West Thundersley should have been included. • SA - NW Thundersley not adequately assessed. • Canvey: Concerns over flood risk. SUDS must be designed with a full understanding	• Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • 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. • Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. 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.	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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											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 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 standard width which						ding of Canvey's unique drainage context. • Green Belt: Welcome decision not to include green belt sites. • Charfleets: Objects to inclusion of residential and lack of engagement,	Canvey SuDS options also have been considered through the 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	

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											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. 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. Note, I do not wish to participate at the oral examination. I am happy that my name will be published alongside my comments to the Castle Point Plan Regulation 19 consultation. Please acknowledge receipt of my submission. Kind regards Christine Rands 14 Chapman Road Canvey Island SS8 7QS									
0975 - 0001	Agent	Daniel	Rapson	Privo Land Limited c/o Ceres Property	Yes	Foreword	No		No	Positively prepared, Effective, Justified, Consistent with national policy	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 Privo (The Chase) Limited “Privo”. 1.2 Privo is promoting Land at and to the rear of 82 The Chase, Thundersley (‘the Site’) for a residential development of c.95 new homes. 1.3 Although the Site is designated as Green Belt, it aligns with the definition of ‘grey belt’ as outlined in the National Planning Policy Framework (NPPF). It is considered suitable,	Please see attached	Yes	Not Answered	Yes	A	Considers the plan to be unsound due to concerns regarding - not meeting the minimum housing requirement - flood risk assessment	Comments noted and response provided to specific policy comments	N	

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											available, and deliverable for residential development and could make a meaningful contribution to addressing the Borough’s significant shortfall in both market and affordable housing. Despite this, the Site is not proposed for residential allocation in the Draft Local Plan (DLP). 1.4 The Site forms part of a wider parcel referred to as GB12 within the DLP and the evidence base. The site was previously proposed to be allocated as part of a wider site allocation in the withdrawn Local Plan (wLP) as policy HO20 ‘The Chase, Thundersley. 1.5 In its current form, the DLP is considered fundamentally unsound when assessed against the soundness tests set out in the NPPF (paragraph 36). 1.6 The DLP’s failure to even attempt to meet the minimum housing requirement, as required by the NPPF, places it in direct conflict with national policy. This is arguably its most obvious and serious flaw. 1.7 Beyond this, there are numerous additional concerns regarding the DLP’s soundness. These include its inadequate approach to flood risk assessment and doubts over the deliverability of the limited number of new homes it does propose. 1.8 We also have concerns regarding legal compliance, particularly in relation to the Environmental Assessment of Plans and Programmes Regulations 2004 (the ‘SEA Regulations’) and the						- deliverability of homes proposed - the SA - Duty to cooperate		

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											accompanying Sustainability Appraisal (SA). 1.9 Furthermore, we question whether the Duty to Cooperate has been properly fulfilled in the preparation of the DLP. 1.10 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 discusses the site selection process, and in particular its approach to Green Belt sites and, specifically, the Site.								
0975 - 0002	Agent	Daniel	Rapson	Privo Land Limited c/o Ceres Property	Yes	DTC	No		No	Positively prepared, Effective, Justified, Consistent with national policy	2.1 The Duty to Cooperate is a statutory obligation 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 bodies to engage constructively, actively, and on an ongoing basis to ensure the effective preparation of Local Plans, particularly in addressing strategic matters that cross administrative boundaries. 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.	2.4 Castle Point Borough is not an isolated borough, and it should be recognised that it is part of a wider housing market area that includes the administrative areas of Basildon, Rochford, Southend-on-Sea	Not Answered	Not Answered	Yes	A	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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											• 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 where reasonable and consistent with sustainable development. 2.3 Whilst the Duty to Cooperate is not a duty to agree, Authorities should make every effort to cooperate. 2.5 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. 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 – pre 2024 NPPF. This is now work	and Thurrock. This geographical context is particularly relevant to the Duty to Cooperate, especially given that the Draft Local Plan (DLP) acknowledges it cannot fully meet the Borough's housing needs. It is clear from Policy SP3 that the DLP will fall pitifully short of meeting minimum housing needs in the early years of the plan in particular – less than a third of its minimum requirement. Given							

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											that needs to be fundamentally reconsidered in light of the updated NPPF (December 2024) and revised PPG, and the approach Councils are now required to address the housing crisis. 2.6 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.	this, we would have expected to see clear evidence that the Council has engaged positively, 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 provided elsewhere, even if not in full. It is unfortunate that there appears to be no compelling evidence of any engagement having been carried out, both							

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												within the evidence base that backs the DLP or within the DLP itself.							
0975 - 0003	Agent	Daniel	Rapson	Privo Land Limited c/o Ceres Property	Yes	SP3	No		No	Positively prepared, Effective, Justified, Consistent with national policy	4.1 Policy SP3 is fundamentally unsound. It is unjustified, fails to ensure the DLP is positively prepared, clearly contrary to national policy, and substantial concerns with its effectiveness. The reasons for this are set out below. Amount 4.2 Policy SP3 of the Draft Local Plan (DLP) proposes the delivery of 6,196 homes between 2026 and 2043, equating to an average of 364 dwellings per annum (dpa). This is despite the DLP acknowledging at paragraph 6.52 that the housing requirement for this period is 11,662 dwellings—based on the standard method for calculating local housing need as set out in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). Notably, the DLP appears to overlook that this figure represents a minimum requirement under national policy. 4.3 Even if the DLP were to deliver all the homes it claims it will (a proposition that is subject		Not Answered	Not Answered	Yes	A	Housing Supply Suggests conflict with NPPF and PPG Green Belt/Grey Belt 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	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 Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper	See Schedule of Modifications re: flooding

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											to significant doubt, as discussed later in this representation), this would still result in a shortfall of 5,466 dwellings. In effect, the DLP seeks to deliver just 53% of the minimum housing requirement set out in the NPPF. There is no evidence of robust arrangements to ensure that the Borough's residual housing need will be met elsewhere within the wider housing market area. 4.4 This approach is clearly inconsistent with the NPPF. More importantly, it contradicts a core aspect of national policy that the Government has identified as critical for Local Planning Authorities to address in tackling the national housing crisis. 4.5 Even setting aside the DLP's direct conflict with the NPPF and PPG, the social and economic consequences of failing to meet housing needs are severe, as outlined in Section 3 of this representation. However, these impacts do not appear to have been given appropriate weight in determining the number of homes to be delivered. 4.6 Section 3 of this representation also sets out concerns regarding Policy SP3 in the context of the Sustainability Appraisal (SA) and the SEA Regulations. These concerns directly affect the soundness of the DLP, particularly in relation to the requirement for Local Plans to be justified. The SA fails to provide a credible rationale for the DLP's decision not to meet housing needs in full,						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..	August 2025. Within the NPPF Paragraph 11 section b (a) and (ii) give an acknowledgement of circumstances in which national policy does not expect Standard Method outcomes to be met in full. <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. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Densities</u> Policy Hou3 indicates the housing mix, including in Premium sustainability areas. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>Emergency Planning</u> Policy SD8 covers Developments near Hazardous Uses. Development proposals within the consultation zone will be assessed in accordance with the Health and Safety	

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											relying instead on flawed reasoning that does not properly assess the implications of meeting versus failing to meet those needs. 4.7 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. 4.8 It is worth noting that the Council previously prepared a Local Plan under the 2021 NPPF, which included limited Green Belt release and aimed to deliver 5,510 homes between 2018 and 2032—an average of 367 dpa. That plan was examined and found sound, subject to main modifications, but was ultimately withdrawn by the Council. The withdrawn but sound Local Plan ('wLP') took a pragmatic approach to Green Belt alterations to meet housing needs, and was found to be consistent with national policy at the time—despite that policy being less permissive than the current NPPF, which the present DLP must adhere to. 4.9 In terms of changes to the NPPF and PPG since the wLP, three key aspects merit highlighting:						<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 the first 10 years of the plan period. <u>Densities</u> The DLP	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).	

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											Exceptional Circumstances and National Policy The NPPF now explicitly confirms that exceptional circumstances justifying alterations to Green Belt boundaries through the Local Plan process include, but are not limited to, situations where a Local Planning Authority is unable to meet its housing needs through other means. Grey Belt Classification The introduction of the ‘grey belt’ concept—referring to Green Belt land that does not strongly serve purposes (a), (b), or (d) of Green Belt designation—provides a clear basis for prioritising such land for release. These areas should be considered as part of any Green Belt review and released ahead of more sensitive greenfield Green Belt sites. Increased Housing Requirement 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. 4.10 The Council’s Castle Point Green Belt Assessment (July 2025) identifies a number of potential grey belt sites within the Borough. The key point in relation to the soundness of 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 reduce the need for housing. Even if development of such land would not meet needs in							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. 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		

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											full, it could reduce the shortfall significantly compared to current proposals. 4.11 The Council's Housing Capacity Topic Paper 2025 makes reference to Borough's 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. 4.12 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: "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." 4.13 This conclusion is baseless and does not use common						the development management standards the DLP proposes. Flood Risk 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 sequentia		

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											sense or logic and seems to suggest edge of settlement sites are rural, divorced from the settlement they are on the edge of, and therefore remote and isolated from services. Even if you were to disregard this assumption, or that sustainable transport is not limited to public transport, the conclusion fails to 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 in that they are capable of complying with NPPF paragraphs 110 and 115. 4.14 Despite the Council expressing their concerns in terms of their ability to address the minimum housing requirement and prepare a plan that can be found sound, directly to the Secretary of State for MHCLG in April 2025, the response from the Secretary 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 very clear response from the MHCLG, it is unclear why the Council has proceeded to consult on a DLP in its current form. Timescales for Delivery 4.15 In addition to concerns regarding the overall quantum of						I 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. To rely so heavily on the delivery of such a development site, fundamental to the DLP's proposed housing strategy, is unjustified and alarming.		

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											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 the first 10 years of the plan period. 4.16 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 increasing significantly, although the figures are still substantially short of the 686 dpa minimum, to 554 dpa from 2031-2043. 4.17 The sequenced approach to delivery of housing growth set out in Policy SP3 is problematic for the following three reasons. 4.18 Firstly, there is an urgent need to redress the woeful supply of housing, nationally, immediately. Pushing the delivery of homes to a later date does not address the current chronic shortage, only exacerbating the shortfall, amplifying the socio-economic ripple effects of the crisis. 4.19 Secondly, the PPG is clear that if a housing trajectory is to be stepped, there should be clear justification for doing so. The strategy must also ensure housing needs are met in full in the plan period. In the DLP's case, neither criterion has been met. 4.20 Thirdly, the LHNA identifies that whilst the affordable						<u>HSE Hazardous Installations Consultation Zone</u> 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			

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											housing need for the Borough over the plan period totals 3,976 dwellings, 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 in particular will have significant negative social repercussions for the Borough. Deliverability 4.21 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. 4.22 A total of 3,143 new homes—representing 51% of the Borough's overall housing provision—are proposed to be delivered through this approach. Of these, 2,000 homes are allocated to the redevelopment of land at West Canvey (Policy C4). However, it is unclear whether this site is suitable, available, or achievable for residential development. As the DLP itself acknowledges, the land is currently occupied by employment uses and a retail park, with a diverse mix of active businesses. 4.23 The DLP suggests the proposed approach will require a density of 150 dph – an extremely high density compared to existing development within the							housing growth.		

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											Borough, and one that will necessitate flattened 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. 4.24 Furthermore, the location is within Flood Zone 3 – land at greatest risk of flooding from tidal or fluvial sources. 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 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. 4.25 Furthermore, 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.								

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											4.26 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 direct significant scale housing growth.								

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0975 - 0004	Agent	Daniel	Rapson	Privatized Land Limited c/o Ceres Property	Yes	SP3	No		No	Positively prepared, Effective, Justified, Consistent with national policy	5.1 This section of our representation concerns the DLP's site selection process insofar as it concerns site GB12 / (Site ID40498) / Land at and to the rear of 82 The Chase, Thundersley ('the Site'). 5.2 The DLP does not allocate any Green Belt land for residential development. The evidence provided by the Council to justify this position is highly questionable, particularly given that the withdrawn Local Plan (wLP) was only recently examined and found sound on the basis that allocating multiple sites within the Green Belt was an appropriate and justified approach. 5.3 Consequently, 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 Green Belt land to be allocated for development. 5.4 In this context, the Council's position as set out in the DLP cannot be justified. Sustainability / Suitability 5.5 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, to the north, south, partly east and west. Importantly, the site is situated within the Thundersley North and	5.33 It is grey belt land that should be prioritised for allocation through the new Local Plan.	Not Answered	Not Answered	Yes	A	Makes case for the inclusion of Site GB12 Land at and to the rear of 82 The Chase, Thundersley.	Noted	N

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											Thundersley South wards, very much within Thundersley. 5.6 The Site is not subject to any physical, environmental, or heritage constraints that suggest it would be unsuitable for residential development. The site does sit within a wider Local Wildlife Site (LoWS), which is not a statutory protection, but mitigation can address any adverse effects. Therefore, the Site’s only constraint to development is that it is located on land designated as Green Belt in the Development Plan dating back to 1998. This designation acts as a policy constraint—a limitation shared by the majority of land that could otherwise help meet the Borough’s needs. 5.7 On 2 October 2020 the wLP was submitted for examination. The Inspector concluded that with modifications the new Castle Point Local Plan was legally compliant and sound and capable of adoption. 5.8 The Inspector’s report sets out main modifications (MM) required, in order to enable the Plan can be adopted. To revise the local housing need figure to reflect changed input figures; To set a stepped housing requirement to reflect the likely delivery of homes in the plan period, and the significant uplift in housing land supply proposed which will take some time to deliver; To amend the Green Belt Policies so that unnecessary duplication is avoided and to make them effective:								

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											To delete Local Policy GB4 Limited Infill – Special Policy Areas as it would not be effective and is inconsistent with national policy for the Green Belt; To alter Policy HO7 Gypsy, Traveller and Travelling Showpeople to include a site allocation, so that the Plan makes provision to meet the specific need for Gypsies and Travellers arising in Castle Point during the plan period; To make detailed adjustments to particular site allocations; To delete the proposed allocation of employment land at the Manor Trading Estate, as exceptional circumstances have not been demonstrated for releasing the site from the Green Belt; and A number of other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy. 5.9 Importantly, within the examination of the wLP the Inspector considered the review of the Borough's Green Belt boundaries and the methodology they adopted was clear and adequate. 5.10 It was noted at Paragraph 42 of the Inspector's Report, that the assessment of available land within the urban area (SHLAA 2018) indicated that around 53% of the housing need (5,325 for the plan period) could be met within the urban area. As such, it would not be possible to rely on increasing the supply of housing within the urban area to avoid altering the boundaries of the Green Belt to meet housing								

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											need. 5.11 The Inspector also noted the need for housing, issues with affordability and the serious shortfall in provision of affordable homes, was a pressing matter then (intensified to the present day). They ultimately concluded that strategic-level exceptional circumstances existed to alter the Green Belt boundary in order to meet the housing needs in the interests of the proper long-term planning for the Borough. 5.12 Disappointingly, the Council resolved to withdraw the 2018-2033 Local Plan and start a new plan, focusing on protecting the Green Belt. 5.13 The Site was proposed to be released from the Green Belt and allocated as part of a wider site allocation for residential development, as part of a masterplan within the wLP 'New Castle Point Local Plan 2018 – 2033 (Policy HO20)'. The policy, referred to as Local Policy HO20 The Chase, Thundersley, sought to allocate 28ha of land off Kiln Road, Thundersley, as identified on the Policies Map, and was allocated for residential purposes, to deliver around 412 homes by 2033. Amongst other policy requirements, the policy expected a masterplan to be prepared within six months of the adoption of the Plan, to establish the capacities of development parcels within the overall site. 5.14 The proposed allocation, within the wLP was supported by a robust and reasoned evidence base, used to inform the								

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											proposed development plan. As set out above, the wLP was considered to be sound by the Inspector. 5.15 Importantly, whilst a planning application on the Site is forthcoming, we refer to a recent planning appeal decision on land further east on The Chase (ref. APP/M1520/W/24/3356256). The appeal for outline planning permission for 47 new dwellings on land east of Chase Mews and west of 310 The Chase, Benfleet was allowed on 6th August 2025, confirming that the site, a parcel within GB12 holding that Privo's Site is situated, was suitable 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. 5.16 The Site's potential suitability, availability and achievability was considered through the Council's Strategic Land Availability Assessment (July 2025) (SLAA). 5.17 The SLAA considered the site in relation to 24 different suitability criteria. In relation to all criteria, with the exception of Local Wildlife Sites and Badger Consultation Zone noting further investigations were required, the SLAA suggested the site was suitable. Despite this, the SLAA concludes the suitability of the Site for residential development was considered unknown.								

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											5.18 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 45 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). Whilst it is not considered that the process of determining site allocations can be broken down to a basic quantitative scoring exercise, these results and the conclusions in respect of the Site's suitability, is concerning. 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. 5.19 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 compliance with NPPF paragraphs 110 and 115. The Topic Paper cites the justification for this stance as follows: "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								

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											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] 5.20 Concerns in terms of how the Site was considered as GB12 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. The Site is sustainable for residential development, as the wLP confirmed. 5.21 The Site is evidently suitable for development. Indeed, the Council’s own evidence base effectively concerns this. Green Belt 5.22 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 Review (GBR) 2018 Part One, in which the following was concluded (referred to as Parcel 6 in the 2018 GBR: “I The parcel is located in the north of the borough and is adjacent to Thundersley along its northern, southern and western boundary, with Hadleigh adjacent to the south east boundary. There is not a clear boundary between the urban settlement and the Green Belt parcel due to the presence of ribbon development along the eastern edge and through much of the centre of the parcel. Much								

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											of this development is inappropriate in the Green Belt and therefore the parcel is assessed as making a moderate contribution to Purpose 1 even though the development which exists in the parcel is of a much lower density than that included in the urban settlement. The parcel is surrounded by residential or other built development uncharacteristic to a rural location across the entire length of its boundary which, coupled with the development within the parcel itself, strongly influences the perception of this parcel being in the countryside. A minor contribution is assessed under this Purpose. The parcel is assessed as not making a contribution to Purpose 2 as development of the undeveloped parts of the parcel would result in the infilling of Thundersley and not result in the merging of Thundersley and Hadleigh, which in any event have already merged at other points outside of the parcel. ” At the strategic level this Green Belt parcel is restricting a small part of Hadleigh and Thundersley from merging, although this merge has already occurred to a significant degree in close proximity. It is a fairly isolated Green Belt pocket which is only linked to the surrounding Green Belt system to the east, but it has a role in providing a recreational resource to residents in Hadleigh and Thundersley. 5.23 The relevant extract of the Council’s Green Belt Review (2018) is provided as Appendix								

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											1. This Assessment work fed into the WLP, resulting in the site's proposed release from the Green Belt and allocation for residential development. 5.24 The most recent Green Belt Review July 2025, builds on the 2018 GBR. The 2025 GBR assesses the parcel GB12 sub area (of which the Site is situated in) as a location for further consideration. The 2025 Assessment considers GB12 as making a weak contribution to purpose a (check unrestricted sprawl of large built up areas); performing no contribution towards purpose b (to prevent neighbouring towns merging into one another); a weak contribution towards purpose c (to assist in safeguarding the countryside from encroachment). Overall scoring a 'WEAK' in relation to its performance against the purposes of the Green Belt overall (Table 10 of the GBR July 2025). 5.25 Within Appendix C of the 2025 GBR, GB12 parcel made a weak contribution to the purposes of the Green Belt. The concluding commentary 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. "Consideration should be given to any potential cumulative impacts arising in respect of the assessment of other sub-areas in close proximity..."								

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											5.26 The relevant extract is provided as Appendix 2. 5.27 The Site and the wider Green Belt parcel clearly does not strongly contribute to the purposes of the Green Belt and is suitable for release from the Green Belt for residential development. As set out above, the Council’s own evidence base suggests this to be acceptable. The site is therefore considered suitable. Availability and Achievability 5.28 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 its development. 5.29 An application will be 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. 5.30 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.95 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 that would be a significant benefit to the community, particularly in light of the Borough’s acute								

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											affordable housing shortage. Overview 5.31 Given the scale of housing need within the Borough and the inability to meet this need without releasing land currently designated as Green Belt, the NPPF clearly supports the amendment of Green Belt boundaries in such circumstances. There are demonstrably suitable, available, and achievable sites for residential development currently designated as Green Belt under a significantly outdated Local Plan. The examination of the withdrawn Local Plan (wLP) confirmed that amending Green Belt boundaries to help meet development needs was a sound and justified approach—even under a national policy framework that was less supportive of such changes, and at a time when the Borough’s development requirements were considerably lower than they are today. The DLP’s refusal to make any alterations to the Green Belt, despite the NPPF’s clear guidance and the outdated nature of current boundaries, renders the plan manifestly unsound. 5.32 The Site is sustainable and deliverable for residential development. 5.34 The site was included in the wLP as being suitable to accommodate residential development and to be released from the Green Belt (Policy HO20). Moreover, a recent appeal decision confirmed a lack of any constraints to the								

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											development of land further east of the Site within the same GB12 parcel as the Site, concluding the development was not inappropriate in the Green Belt. 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, as was undertaken in the wLP and found to be a sound strategy. 5.35 The failure of the DLP to allocate the Site must be considered in the broader context of its inability to meet identified housing needs, and the acute shortage—particularly of affordable housing—that the current draft plan would exacerbate. 5.36 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.									
0709 - 0001	Individual	joy margaret	raven	F81112	Yes	SP3	Yes		No	Justified, Consistent with national policy	it doesnt meet the national policy and it is not justified .Also it is not justified as the plan is biased or predetermined towards an anti -build on the greenbelt agenda.it has excluded viable alternative sites , and is based on the excessive over development of Brownfield sites ,especially on Canvey island.	Need to add the Nort West Thundersley site ,the blinking owl site as known by many .Labelled GB16on the consulati on .This 160	No	Not Answered	Not Answered	A	North West Thundersley	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	N	

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												hectares ticks all the boxes. This could add up to 7500 homes.						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.	
1275 - 0001	Individual	Kim	Rawling			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	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					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	<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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								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.				1050. Total housing target of 11,000.					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	All reasonable options 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> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDS</u> Policy SD3 covers SuDs and part 3	

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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	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.	
1275 - 0002	Individual	Kim	Rawling			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									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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								and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1275 - 0003	Individual	Kim	Rawling			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
0439 - 0001	Individual	Stephanie	Rawlinson		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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0470 - 0001	Individual	Cheryl	Ray		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.		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	<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> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	selectiction 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.	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>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey 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	

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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.	
0470 - 0002		Cheryl	Ray		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

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0470 - 0003		Cheryl	Ray		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 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. All; Greenbelt sites on Canvey West need total protection from government intervention. 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. 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	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: Establish firm 2 year timeline for comprehensive lake dredging with dedicated funding and delivery agency. Create annual maintena	No						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 the lake is upkept and will detail who is responsible for this.	N

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											delivery mechanisms and ongoing maintenance commitments. 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 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.	nce dredging schedule with long-term budget allocation . Set measurable targets for lake capacity increase and water quality improvements. Designate responsible agency for ongoing lake management with annual progress reporting and community consultation. COMMUNITY ENGAGEMENT: Engage with Friends of Canvey Lake, a community group, with 2.5k members champion								

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												ing the reset of Canvey Lake to its pre-2010 conditions, to ensure resident-led lake management improvements.							
0012 - 0001	Individual	Eileen	Read		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	No	Not Stated	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 does not yet meet these essential criteria in full.	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	Not Stated		No	A	Welcome decision not to include Green Belt sites but warns it's meaningless without a deliverable housing supply. • Strongly objects to over-allocation of housing on Canvey Island due to flood risk, infrastructure strain, and unsuitable drainage systems. • Supports	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 • 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). • Biodiversity:	N

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								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			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 clearly evidenced and that all reasonable alternatives be fully	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						inclusion of North West Thundersley (Blinking Owl site) as a strategic growth location with better connectivity and lower environmental risk. • Criticises lack of robust evidence for reduced housing target and failure to demonstrate a five-year housing land supply. • Argues the Plan is unsound and not legally compliant due to weak Duty to Cooperate, poor Sustainability	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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								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			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 levels, tidal influence and reliance on pumped discharge	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.						Appraisal, and inadequate biodiversity safeguards.		

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								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			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 housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan								

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								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			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 point to Canvey because of its unique geography remains a								

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								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			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 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								

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								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			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 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								

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								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			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 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								

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								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			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, 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								

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								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. The Plan’s approach to biodiversity and environmental protection also requires			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 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								

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								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			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 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								

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								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			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."								

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								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.											
0012 - 0002	Individual	Eileen	Read		Yes	Forward	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation	No	Not Stated			Not Stated		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								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									ure and housing distribution.		

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								demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
1057 - 0001	Individual	Sam	Read		Yes	HAD4	No		No	Positively prepared, Effective, Justified, Consistent with national policy	I don't feel the draft has considered the impact of the local residents and needs of the area. There has been no consideration regarding the traffic issue that is experienced on this road, which constantly gets busier. The houses are built so close together that there is no room for parking which in turn makes scrub lane a car park. The environmental issue of 114 houses worth of waste and sewage on the local area and the lack of green space. The school it backs on to already cannot support the number of students wishing to attend let alone having more. The document states footpaths and cycle lanes that currently don't exist, and with busier roads I don't see how they can exist.	More clarification on how they came to the number of 114 of homes and not less. The houses on this street are large with plenty of land. The number proposed will mean they are small, no land and won't fit in with the current houses. Not mentioning the lack of parking or facility for parking. The school already	Yes	Not Answered	Not Answered		Objecting to HAD4 because: Traffic No parking provision Infrastructure How did they get to 114	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. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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												causes traffic issues, less space and more students will mean more traffic being funnelled in to a smaller space, this is not safe.						Density of the site The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details	
0252 - 0001	Individual	Frances	Reading		Not Stated	Whole Plan	No	It is not legally compliant and is very unsound also not fair on the residents of canvey which is an island.	No	Not Stated			Not Stated		No		Not fair on the residents of canvey which is an island.	Comments noted.	N
1143 - 0001	Individual	Angela	Reading			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	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,					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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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	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.					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 Thundersl	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 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	

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																	ey 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	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.	
1143 - 0002	Individual	Angela	Reading			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different.									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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								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.											
1143 - 0003	Individual	Angela	Reading			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	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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																	living at East Canvey		
1445 - 0001	Individual	Frances	Reading			SP3	No	That your plan is unsound and illegal we don't need more houses canvey is over populated now	No								That your plan is unsound and illegal we don't need more houses canvey is over populated now	Noted	N
0016 - 0001	Individual	Cheryl	Redwin		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	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	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.	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. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and	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 • 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.	N

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								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			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 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	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 Thundersl					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 modificati	In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • 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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								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			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 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	ey 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.					ons to reduce pressure on Canvey and include North West Thundersley.		

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								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			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 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								

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								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				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 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							

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								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			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 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								

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								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				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 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.							

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								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			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 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								

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								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			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, 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								

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								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			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 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								

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								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. 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 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.								

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								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											

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								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.											
0016 - 0002	Individual	Cheryl	Redwin		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	No				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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								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											

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								risks being found unsound on procedural grounds alone.											
0457 - 0001	Individual	Paul	Reed		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 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.				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 provision for around 364 new homes a year	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.							(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 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	

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																		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 paper. 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	

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																		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. 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,	

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																		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. 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. 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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1232 - 0001	Individual	Susan	Reed			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1232 - 0002	Individual	Susan	Reed			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1232 - 0003	Individual	Susan	Reed			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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1278 - 0001	Individual	Peter	Reed			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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1278 - 0002	Individual	Peter	Reed			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1278 - 0003	Individual	Peter	Reed			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
1428 - 0001	Individual	G	Reeves-Nurse			SP3	Not Stated	Future building on Canvey Island is dangerous, for the following reasons:- The Island flooded with loss of life and it is possible it could	Not Stated								Future building on Canvey Island is dangerous, for the following reasons:- The Island flooded with loss of life and it is possible it	Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey,	N

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								happen again. There is not adequate roads for hundreds more cars, it is currently bad anyhow, for access on and off the Island. There are not adequate schools, GPs, dentists, medical services, shops of all descriptions, no emergency hospital service, no police station and lack of policing. I hope this helps the council decide not to build more houses on Canvey Island.									could happen again. There is not adequate roads for hundreds more cars, it is currently bad anyhow, for access on and off the Island. There are not adequate schools, GPs, dentists, medical services, shops of all descriptions, no emergency hospital service, no police station and lack of policing. I hope this helps the council decide not to build more houses on Canvey Island.	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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1395 - 0001	Individual	David	Regan		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
1271 - 0001	Individual	Norma	Reis			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	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					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	<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> All reasonable option sites were considered in the	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.				target of 11,000.					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	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> 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	

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																	Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1271 - 0002	Individual	Norma	Reis			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1271 - 0003	Individual	Norma	Reis			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
0327 - 0001	Individual	Gordon	Retter			SP3	Not Stated	Having tried to study the documentation forming the basis and consideration of the plan, I would simply make the	Not Stated	Not Stated		Even if such increased housing gets approval, at the very least a third road is required that should incorporat					Critical of excessive housing number requirements and questions the methodology behind government numbers.	Points noted. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD3 covers SuDs and part 3 states they must reflect and respond to site	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDs feature(s) reflect and respond to the site circumstances,

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								following comments Housing requirements One of my main thoughts concern the housing requirement methodology. How does the government arrive at this figure. The figure of 686 homes per year appears excessive. The councils Local Housing Needs Assessment 2023 identified a need for approx 255 homes per year yet are now proposing 364. WHY? I constantly read that newcomers to Castle Point seem to come from East				e a dual carriageway.					Advocates the HNA 2023 figure of 255homes p/a. Questions whether this is local need or from East London. Believes growth is driven by financial incentives to sell at London prices. Says the urban first approach makes sense. Suggests that the retail parks are actually drawing people into the Borough and that they will decline in future due to the growth of online shopping. Questions whether supportin	circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the 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 out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan The Council has met with Anglian Water to produce a Statement of Common Ground and agree policies.	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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								London and surrounding areas. That doesn't signify local need to me. Whatever the reason, many of these new residents arrive first and then ask about schools, doctors, facilities etc after the event. I believe it maybe a financial incentive to sell property at London prices to then purchase less expensive property here in Castle Point leaving a surplus of funds. Also I believe population levels are reducing. Has this been									g infrastructure will be overwhelmed. Holiday plot land does not have proper drainage. Cites indirect source at Anglian Water expressing concern. Suggests a third road is needed to Canvey.		

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								taking into consideration. Also due to economic conditions many offspring of existing residents remain living with their parents as homes for many are unaffordable thus logically reducing the need for such increased local building. How were new homes businesses and other facilities locations decided? The urban first approach makes sense but the plan seems to propose the use of existing industrial sites for housing. Also we											

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								already have several retail parks on Canvey and another proposed on land opposite Morrisons off Roscomm on Way Canvey. Such estates already attract visitors from beyond the borough in addition to its own residents bringing pressure on roads and infrastructure. Increasingly though retail shopping is generally declining due to online shopping so there should naturally be less need in future.											

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								Providing the right type of new homes Providing the right type of new homes As much as a convincing argument for more housing there is the overwhelming question of supporting infrastructure. The history of development particularly on Canvey means much uncontrolled building took place. Staking out land of a holiday plot to become proper houses took place on a large scale without proper drainage. I have											

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								spoken to an Anglian Water representative (a former neighbour) who told me the drainage system such as it is is a disaster. Inferior pipework joined to new housing pipework is creaking and could well fail on a large scale without any additional housing. We see only too often on Canvey flooded roads evidence of poor condition and maintenance. That's just surface water let alone unseen sewerage											

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								drainage. The overriding issue to object to such additional housing is the totally inadequate road system that can't cope with the existing housing stock and vehicle movement. All roads lead to two exits roads off Canvey both single carriageways											
1073 - 0001	Individual	Richard	Revell		Yes	HAD4	Yes		No	Positively prepared, Justified	Hadleigh is already overcrowded, with significant traffic down Scrub Lane following the development of Scrub Lane Mews. During school runs, Scrub Lane is reduced to a single lane road. There are no resources within Hadleigh for additional population. It is not appropriate to house persons with complex needs so close to schools / parks / playgrounds.	I would suggest first increasing resources within Hadleigh as well reviewing the traffic flow.	No	Not Answered	Not Answered	A	Objecting to HAD4: Traffic Infrastructure Location of homes for people with complex needs next to the 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. Infrastructure Infrastructure matters (including healthcare and	N

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																		education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). The council has a duty to provide homes for all	
1074 - 0001	Individual	Laura	Revell		Yes	HAD4	Yes		No	Positively prepared	Scrub Lane will not be able to handle the increase in traffic from 114 homes, the development at Scrub Lane Mews evidences this as there is always a bottleneck of traffic plus the school traffic causes issues. Housing “complex needs” so close to schools and the playground is also concerning. In general the infrastructure is not there to support a development of this size and it is not in keeping with homes already on Scrub Lane.		Not Answered	Not Answered	Not Answered	A	Objecting to HAD4: Traffic Infrastructure Location of homes for people with complex needs next to the school Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). The council has a duty to provide homes for all	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.	N
0664 - 0001	Individual	Jane T	Reynolds		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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0665 - 0001	Individual	Raymond	Reynolds		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant ,	Support noted.	N
0534 - 0001	Individual	Jeanine	Rhodes		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	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 towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at	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 increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the	N

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											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.						risk with emergency evacuation procedures Need for a third road to be included in the plan.	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 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	

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																		transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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	

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

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																		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 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	

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																		Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0534 - 0002	Individual	Jeanine	Rhodes		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	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 commitments. Full details of the 480 existing commitment can be found within the housing	N

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																	the site environment for local residents 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 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.		

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0534 - 0003	Individual	Jeanine	Rhodes		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
0048 - 0001	Individual	Michelle	Richardson		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	A	Castle Point Plan is sound and legally compliant ,	Support Noted	N

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0058 - 0001	Individual	Erik	Richardson		Yes	Whole Plan	Yes	I support the Castle Point Plan Regulation 19 Draft Consultation I consider the draft plan 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
0696 - 0001	Individual	Paddy	Richardson		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant ,	Support noted.	N

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0302 - 0001	Individual	Kieth	Rider		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		It doesn't meet the housing target for Castle Point. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. 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	<u>Consideration of All Sites</u> All reasonable options 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> covered under policy GB2. <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.	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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																	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.	<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. <u>Emergency Services</u> Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	

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0302 - 0002	Individual	Kieth	Rider		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		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	<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> covered under policy GB2. <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.	Y - Policy SD3(3) '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 Assessment (SFRA) and recommendations/ advice from statutory bodies

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																	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+	<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. <u>Emergency Services</u> Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	(including EA, Essex LLFA).'

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																	urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		

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0528 - 0001	Individual	Gina	Ridge well		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 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 procedure s	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 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	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.						Need for a third road to be included in the plan.	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 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.	

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																		Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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 capacity of the highway network in	

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																		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. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey,	

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																		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 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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0528 - 0002	Individual	Gina	Ridgewell		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 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 has been identified through the Open		N

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																		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.	
0528 - 0003	Individual	Gina	Ridgewell		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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1136 - 0001	Individual	Angela	Riggs			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1136 - 0002	Individual	Angela	Riggs			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1136 - 0003	Individual	Angela	Riggs			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
0848 - 0001	Individual	Derek	Ringer		Yes	Whole Plan	Yes		Yes	Positively prepared			No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant	Support noted.	N
0868 - 0001	Individual	Susan	Ringer		Yes	Whole Plan	Yes		Yes	Positively prepared			No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant	Support noted.	N

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0011 - 0001	Individual	James	Robbins		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	No	Not Stated	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 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	I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate. 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	Not Stated		No	A	Supports Green Belt protection but argues the Plan fails to justify its housing shortfall or demonstrate a deliverable five-year supply. • Duty to Cooperate is a particular shortcoming - absence of clear and binding agreements. • Strongly objects to over-allocation on Canvey Island due to flood risk, drainage limitations, and lack of a third access road. Suggests that standard	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 • 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). • 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. • North west Thundersley was	N

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								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			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 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. 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	Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000					SuDS solutions will not work on Canvey. - Criticises the exclusion of North West Thundersley (Blinking Owl site), which he sees as a more sustainable and infrastructure-led alternative. SA fails to consider it properly. Calls for Plan modification to include North West Thundersley and reduce pressure on flood-prone areas. 5 years housing supply not demonstrated (Just	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.	

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								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			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 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 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						53%) with reliance on constrained sites casting doubt on delivery. • Approach to biodiversity and environmental protection requires strengthening. If mitigation measures require enforceable delivery mechanisms and clear implementation pathways.		

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								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			aspirations. Castle Point is a unique 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 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								

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								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 constructiv			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. 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								

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								e 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			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.								

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								ire 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											

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								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											

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								ng 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											

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								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. 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											

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								strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been adequately assessed. While the Sustainability Appraisal acknowledges the option, it is given nowhere near enough consideration and the assessment of it lacks the depth of analysis applied to other alternatives. There is no transparent comparison of its sustainability											

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								performance, nor a clear justification for its exclusion. This omission undermines the credibility of the appraisal and raises legitimate questions about whether all reasonable alternatives have been properly considered. 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											

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								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											

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								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											

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								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											

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								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.											

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								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											

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								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											

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								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											

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								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											

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								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											

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								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. The NPPF is 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											

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								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											

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								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											

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								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											

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								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											

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								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											

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								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											

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								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											

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								y 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											

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								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											

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								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											

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								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 developme											

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								nt 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 speculativ											

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								e 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											

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								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,											

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								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.											

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								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											

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								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											

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								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											

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								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.											

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								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 Fairglens Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions,											

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								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											

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								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											

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								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,											

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								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											

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								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											

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								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, evidenced, 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											

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								embraced, not dismissed.											
0011 - 0002	Individual	James	Robbins		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	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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								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											

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								risks being found unsound on procedural grounds alone.											
0047 - 0001	Individual	James	Robbins		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.	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	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	Not Stated		No	A	A unique and tightly constrained area. Welcomes the decision not to include any of the Green Belt sites. 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 disproportionate and	Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. North West Thundersley has been considered, including in the Sustainability Appraisal. SA 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. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts	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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								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			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 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	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. Essex County Council is					excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. 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. Should also be subject to	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. Canvey SuDS options have been considered through the Surface Water Modelling Technical Note of the SFRA.	

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								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			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 discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The	investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.					SA as a reasonable alternative. The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. 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		

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								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			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 as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised						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 exploratio		

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								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			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. 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. Castle Point Borough Council deserves credit for adopting a brownfield-first							n 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. Castle Point Borough Council deserves credit for adopting a brownfield-first	

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								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			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, 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						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. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value.		

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								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			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 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						Its protection is essential.		

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								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 demonstra			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 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								

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								ble 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			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, 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								

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								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			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 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								

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								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			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 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.								

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								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											

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								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.											
0047 - 0002	Individual	James	Robbins		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	No				c		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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								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											

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								risks being found unsound on procedural grounds alone.											
0094 - 0001	Individual	James	Robbins		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.	No	Justified, Consistent with National policy	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 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	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 Charfleet Industrial	Not Stated		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	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 and respond to site circumstances and have regard to the	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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								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			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. 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	Estate site from the plan. Total housing target of 11,000.					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	ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	

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								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			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 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						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		

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								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			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 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						target of 11,000.		

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								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 consider the Castle			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. The NPPF is 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								

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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.			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 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								

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											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 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								

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											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 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								

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											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 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								

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											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 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								

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											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, 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								

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											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 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.								

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											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. 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. 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								

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											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 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. 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								

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											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 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								

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											integrated with residential homes.								
0094 - 0002	Individual	James	Robbins		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	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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								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											

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								risks being found unsound on procedural grounds alone.											
0774 - 0001	Individual	James	Robbins		Yes	SP3	No	This report demonstrates that this approach creates two critical vulnerabilities. First, the plan disproportionately concentrates new housing on Canvey Island, with over 3,300 homes allocated to the town. This concentration is likely to place an intolerable strain on the island's limited infrastructure, particularly its road network, which is prone to significant congestion	No	Positively prepared, Effective, Justified, Consistent with national policy	The council's failure to present unassailable evidence could lead to the plan being found unsound, forcing a revision that could ultimately result in the very outcomes it sought to avoid. 6. Critical Analysis of Major Planning Issues 6.1 The Disproportionate Burden on Canvey Island The concentration of over 3,300 new homes on Canvey Island is a highly contentious issue that underpins much of the local opposition to the new plan.	Conform to the national guidelines	No	Not Answered	Not Answered	A	Infrastructure Transport Green Belt 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 Point, including improved linkages to other areas. Growth in Castle Point will	N	

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								. Second, the council's absolute prohibition on Green Belt development, without a fully evidenced justification for why alternatives like higher-density brownfield development have been exhausted, runs contrary to NPPF guidance. This rigid stance may be legally challenged by the Planning Inspectorate, potentially leading to a forced revision of the plan or a declaration that it is unsound, which could, in a										facilitate the delivery of the proposals in the Local Transport Plan 4. Green 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 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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								paradoxical outcome, result in the very Green Belt release the plan was designed to prevent										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.	
1396 - 0001	Individual	Mr Peter	Robbins		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
1397 - 0001	Individual	Mrs Peter	Robbins		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
1438 - 0001	Individual	Mr	Roberts		Yes	Whole Plan	Yes		No	Justified	Don't need any more houses. It will cause more congestion and pollution	None. Leave the green belt alone due to the wildlife	No				Don't need any more houses. It will cause more congestio	Noted	N

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																	n and pollution. None. Leave the green belt alone due to the wildlife		
0701 - 0001	Individual	Gavin	Robertson	STW FM Co Ltd	Yes	SP3	Yes		No	Positively prepared, Effective, Justified	There is little within the Canvey Island allocation of dwellings that is Positively Prepared. Density of housing levels within Canvey Island are being expanded without consideration towards the infrastructure ie education, transportation, medical and citizen amenities. Moreover, to expand an island dwelling base where there are already severe strains on existing facilities is short sighted and unprofessional, this is NOT a “build it they will come” experiment. From an effective point of view....There is little consideration for quality and the word quantity seems to be the top of your agenda. There are suitable alternatives in order to achieve the housing plan targets elsewhere with Castle Point.....namely North West Hadleigh. From a justified standpoint it makes little sense in overloading an already stretched Canvey, in order to house over 3000 homes when Canvey Island has already an expansion of over 150 homes a year by the Sandy Bay project....this was not mentioned in your proposals and indeed on discussion...your planning team knew nothing of this Sandy Bay number or development as it did not need their approval. This is why I am	Reconsider the option of North West Hadleigh site (known as the Blinking Owl site) for utilisation and Dwelling use of that brown field site rather than flatten the Charfleets industrial area within Canvey Island only to relocate that site elsewhere on Canvey....in order to build those 3000	Not Answered	Not Answered	Not Answered	A	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.	N

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											complaining to your loaded survey is ill conceived. poorly executed and lacking in justification.	dwelling. This is almost a nonsensical decision unless you want to do things twice!							
0703 - 0001	Individual	Karon	Robertson		Yes	SP3	Yes		No	Justified	Unfortunately Reg 19 on housing has taken all the oxygen out of the plan and no one seems interested in anything else because it is not fair. Canvey is taking the brunt of the housing needs for the borough as we do not have much green belt land. It seems the loaded question in the consultation puts green belt use above safety and common sense. How can you expect another 3 thousand plus homes on the island with no new infrastructure, roads, gp surgeries, schools etc. 3 thousand plus houses equates at minimum to 3 thousand extra cars. On a Saturday morning you cannot leave the island in less than an hour. One broken down car at anytime will bring the island to a halt. Until there is a new road there should be no more building. Why has NW Hadleigh not been allocated more housing?	Making the housing allocation fairer across the borough. Consider other areas green belt if necessary .	No	Not Answered	Not Answered	A	North West Thundersley Third Road onto Canvey Infrastructure	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 onto Canvey The plan has been subject to detailed Transport Assessment,	N

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																		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 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	

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																		Plan. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
0850 - 0001	Individual	Ambler	Robertson		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant ,	Support noted.	N
0458 - 0001	Individual	Laura	Robinson		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant ,	Support noted.	N
0641 - 0001	Individual	Caron	Robinson		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant ,	Support noted.	N
0642 - 0001	Individual	Andrew	Robinson		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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1159 - 0001	Individual	Mary	Robinson			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1159 - 0002	Individual	Mary	Robinson			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1159 - 0003	Individual	Mary	Robinson			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
0142 - 0001	Individual	Jemma	Roche		Yes	SP3	No	Dear Sir/Madam , I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft	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	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	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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDs feature(s) reflect and respond to the site circumstances,

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								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.			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 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.	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.	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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																	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.		
0142 - 0002	Individual	Jemma	Roche		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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0767 - 0001	Individual	Jemma	Roche		Yes	SP3	Yes		No	Justified	If we can only have all the improvements with the building of residential homes, then the plan does not justify the need for Canvey. Islanders need better infrastructure, but at the detrimental cost of more people on the island, more housing is not a solution.	Provide all the updates but without the detrimental cost of the new homes. Having more people live here will not improve anything	No	Not Answered	Not Answered	A	No homes, more infrastructure	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 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	N

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																		but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
0680 - 0001	Individual	Paul	Rogers		Yes	SP3	No	The Infrastructure is simply not there to support this number of dwellings on Canvey Island. The access on and off the Island is not sufficient for the existing number of road users today and adding thousands more vehicles will make the matter much worse. Canvey	No	Positively prepared, Effective, Justified, Consistent with national policy	It looks like the allocations for Canvey are hugely disproportionate to other parts of the Borough, for example this is just a consultation looking for the public's opinion but the Council have already decided that 0 new homes will be allocated to Daws Heath? Not a single site in that area for even 1 new home has been identified. I also feel like areas of potential like the Blinking Owl has been missed as potential sites of large volume housing that will not have the level of impact Canvey would see. The West Canvey site is very close to existing hazardous sites and will make any evacuation of the Island impossible. This is a massive negative impact on residents' safety both new and existing. This is a really disturbing disregard of residents' safety in favor of not building in other areas.	Look into the feasibility of sites like Blinking owl and potential use of some Greenbelt due to the disregard of residents' safety in the existing areas chosen.	No	Not Answered	Not Answered	A	Third road onto Canvey Flooding on Canvey Lack of Infrastructure	Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). 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	N

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								does not have the school places to support more children as the existing schools are already over subscribed , as are the doctors and dentists. Other parts of this plan also include sites that are currently used as doctors surgeries. Canvey Island is already susceptible to flooding from both the Thames and surface water. Canvey Lake and the surface water flood										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. Flood Risk 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	

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								protection have been poorly managed for over a decade and are not working as they should. building over soil will reduce the amount of surface water that can be absorbed and push it to other areas that are not designed to cope with higher volume and impact existing homes and residents. Adding a 56 place nursery for 2000 new homes is pointless as if a couple with 1 child moved into those										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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								homes it would be an additional 6000 people, if 50% of those home had 1 younger child there would be 1000 places required?											
0680 - 0002	Individual	Paul	Rogers		Yes	SP3	No	A dph figure of 150 suggests high volume housing will be required such as high rise tower blocks? this is not in keeping with the area and will be an absolute stain on the horizon. This type of area exists in London and they also tend to have a high crime rate. As we have	No	Positively prepared, Effective, Justified, Consistent with national policy	I feel that the plan is using Canvey as a dumping ground and an easy way out. I do not feel that this plan would pass scrutiny and simply leaving the infrastructure as is will make the Island a horrible place to be. This could negatively impact house prices and then residents will become stuck and not be able to afford to move. The plans allocations are not fairly distributed as some areas have already been confirmed as having 0 new homes despite this only being a consultation where the public allegedly can have an influence. If its just down to public consultation then all areas should be considered with new home allocation as its the responsibility of the whole borough.	Consider ALL feasible sites not just ones picked by councilors. Consider the fact that building a large development on some Greenbelt may actually stop massive disruption to existing residents and be better for all in the long run.	No	Not Answered		A	Density Loss of businesses	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. Loss of Businesses 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'. This policy will apply until such time as a	N

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								no full time police service on the Island I see no way that this can be managed. Multiple high rises could be needed to achieve the high targets with vast areas of parking and roadways that will disturb the water flow and retention capabilities of the surrounding area, this in turn will push surface water to areas that are not used to or set up to deal with the additional volume and disrupt existing residents homes and										master plan for West Canvey has been developed. 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.	

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								potentially their health and safety. There are no provisions for increased access to and from the Island and not provisions for additional school or medical facilities. It is confirmed in the plan that the existing businesses will be impacted so we could lose some of the shopping or business facilities that we benefit from today as they do not want to deal with the disruption. I assume that there											

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								will be rent or rate increases to help pay for this outrageous idea and that could see the end of many small businesses .											
0680 - 0003	Individual	Paul	Rogers		Yes	SP3	No	Adding more dwellings to the center of the Island and changing the road layout could cause utter disaster for residents trying to access or leave the Island. Putting hundreds more cars on the road will have a negative impact regardless of the local road	No	Positively prepared, Effective, Justified, Consistent with national policy	The distribution of sites within the plan is largely set against the Island and in my opinion show a prejudice against the area. The plan disregards areas such as Daws Heath with a confirmed 0 allocation even at consultation level and does not consider residents safety or wellbeing when it come to hazardous sites or any attempt at an emergency evacuation. The residents of Canvey are being put at risk in favor of appeasing mainland councilors.	Consider all sites including Daws heath and sites like the Blinking Owl where 1 development could house more new homes that potentially the total suggested in the local plan.	No	Not Answered		A	Traffic concerns	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	N

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								layout as all traffic still needs to navigate through Waterside Farm roundabout. Adding this many more homes will increase the need for resident parking which in turn will reduce the availability of visitor parking and could negatively impact the businesses . The paddocks is currently over budget in a phased plan to save it? to now turn around and suggest it should be demolished and reinvented											the Local Transport Plan 4.	

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								(as suggested years ago by previous councilors, that was fought back against aggressively by existing councilors is utterly incredulous). This shows how wasteful this administration is. To identify that the Paddocks has a finite lifespan and recommended its removal after years of residents campaigning shows disregard of residents opinion and a lack of understanding.											

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1246 - 0001	Individual	Michael	Rogers			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1246 - 0002	Individual	Michael	Rogers			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1246 - 0003	Individual	Michael	Rogers			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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0502 - 0001	Individual	Jean	Rooney		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 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 procedure s	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 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	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.						Need for a third road to be included in the plan.	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 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.	

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																		Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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 capacity of the highway network in	

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																		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. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey,	

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																		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 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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0502 - 0002	Individual	Jean	Rooney		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 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 has been identified through the Open	N

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																		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.	
0502 - 0003	Individual	Jean	Rooney		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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0518 - 0001	Individual	Martin	Rooney		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 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 procedure s	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 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	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.						Need for a third road to be included in the plan.	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 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.	

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																		Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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 capacity of the highway network in	

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																		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. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey,	

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																		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 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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0518 - 0002	Individual	Martin	Rooney		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 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 has been identified through the Open	N

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																		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.	
0518 - 0003	Individual	Martin	Rooney		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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0619 - 0001	Individual	Kim	Rose		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 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.	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 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	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.						Need for a third road to be included in the plan.	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 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.	

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0619 - 0002	Individual	Kim	Rose		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 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 has been identified through the Open		N

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																		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.	
0619 - 0003	Individual	Kim	Rose		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.						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
0114 - 0001	Individual	Susan	Ross		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation	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	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	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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and

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								on. 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.			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.						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	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.	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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																	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.		
0114 - 0002	Individual	Susan	Ross		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

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1213 - 0001	Individual	Anne	Roud			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1213 - 0002	Individual	Anne	Roud			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									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. 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
								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1213 - 0003	Individual	Anne	Roud			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
0361 - 0001	Individual	Annette	Rousou		Yes	Had3	No	I saw no consultation on the closing of the clinic. I know its popular for blood testing and being a local place, if one is ill, it is easier to	Yes			Clinics should be made more use of for medical services: blood testing, hearing tests, urine testing				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	N

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								go to rather than have to go to Southend Victoria.				collection etc						proposed site would not be built upon.	
0361 - 0002	Individual	Annette	Rousou		Yes	Thun3	No	I saw no consultation on the closure of this clinic, a local place for blood testing and essential for less mobile and non drivers,	Yes			Keep local clinics open and operating better and for more services to be facilitated there. Otherwise , I find the plan saves the greenbelt, which was the policy P.I.P were elected for. I understand the concerns of the people on Canvey regarding needing a third roading and building there will exasabate this need. However, London Rd, Kiln Rd, Rayleigh Rd, are				A	Objecting to THUN3 because: 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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												often at a standstill in rush hour and any time during the weekends , so we don't need more cars living in borough.							
0361 - 0003	Individual	Annette	Rousou		Yes	HOU2	Yes	However, affordable housing is used to make people feel better about allowing development, the first buyer will never be able to own it; the second buyer will have no restriction on what they can sell it for, therefore it does not remain affordable, unless you are moving from London where homes sell at a premium.	Yes			See comment on where the blood testing facilities will be in Hadleigh and Benfleet.				A	Concern regarding affordability of affordable housing	The definition of affordable housing and what can be included as affordable housing provision is set by the government through the NPPF.	N

ID Ref	Individual/Organisation/Age nt?	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
								Locals will be priced out of their own area and Castle Point will end up being a mini London											
1150 - 0001	Individual	Ron	Rowe			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:	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					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	<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> All reasonable option sites were	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.				housing target of 11,000.					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	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> 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	

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																	Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1150 - 0002	Individual	Ron	Rowe			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									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. 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
								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1150 - 0003	Individual	Ron	Rowe			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

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
1151 - 0001	Individual	Jan	Rowe			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1151 - 0002	Individual	Jan	Rowe			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1151 - 0003	Individual	Jan	Rowe			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

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
1262 - 0001	Individual	Patria	Ruff			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1262 - 0002	Individual	Patria	Ruff			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1262 - 0003	Individual	Patria	Ruff			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
0097 - 0001	Individual	Dawn	Rumsley		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	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 the national policy. It is not consistent with the National Policy, it does not meet the housing target for Castle Point and the sites selection ignores Greenbelt and Grey Belt against new NPPF guidelines. I consider it not to be justified as the site selection strategy is biased and pre-	I believe the following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and	No			B - see 0097-0003	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt	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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances,

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								West Thundersley and it has no credible five year housing land supply.			determined towards a “no Greenbelt build policy”, it is solely based on the over development of “brownfield sites”, it has not considered all sites, with no greenbelt/grey belt sites added and with the exclusion of the North West Thundersley site the NPPF guidelines state that developments should be directed away from areas at the 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 put residents in the East at risk with any emergency evacuation procedures. I consider it not to be legally prepared and sound due to the two hazardous installations located at the south of Canvey Island which are regulated by the HSE in accordance with the Control of Major Accident Hazards Regulations and would pose additional risk to any potential occupants of any new developments. I believe that has been poor engagement and officers have not engaged with the HSE on proposed developments which fall within the consultation zones of hazardous installations.	sound 1. Add North West Thundersley site, 187 Ha, as Greenbelt , Grey Belt, Brownfield site option for 7500 homes. 2. Reduce the urban housing target to 3500 from 6200 with Canvey at 1050 3. Remove Charfleet’s Industrial Estate site from the plan Total Housing target of 11,000					, 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	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 have been considered through the SFRA.	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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																	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		

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																	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.		
0097 - 0002	Individual	Dawn	Rumsley		Yes	C4	No		No	Justified, Consistent with National policy	The inclusion of Charfleet's Industrial Estate as a brownfield site for development into a mixed use of housing and industrial area has not fully considered the impact on the micro, small, medium and large businesses currently operating on the estate who are currently renting property or own their own site. There is no assessment of how they will be able to be operationally or financially continue to operate in said area. Should they be forced to move to new premises or have restrictions imposed upon their existing operations in the future due to the proximity of new residential properties. This	I believe the following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound 1. Add North West Thundersley site,	No			B - see 0097-0003	Charfleet s: Objects to the inclusion of Charfleet's Industrial Estate for development into a mixed use of housing and industrial. Has not fully considered the impact on	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	N

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											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 currently on the Charfleet's Industrial Estate. The future plans of the Charfleet's Industrial Estate needs a fully supported, with full economic regeneration of the estate. There is no reasoned justification for using Charfleet's Industrial Estate for housing, with businesses integrated with residential homes.	187 Ha, as Greenbelt, Grey Belt, Brownfield site option for 7500 homes. 2. Reduce the urban housing target to 3500 from 6200 with Canvey at 1050 3. Remove Charfleet's Industrial Estate site from the plan Total Housing target of 11,000					the existing businesses. There has been poor engagement.		
0097 - 0003	Individual	Dawn	Rumsby		Yes	C4					This plan clearly neglects the factor that Canvey Island has ONE ROAD OFF - The two roads converge at the waterside roundabout which causes issues at rush hour times and also should an incident occur - ie, broken down vehicle, vehicle involved in a RTA - The proposed number of dwellings as outline in your planning regulation would see on average - of 2 cars per dwelling an extra 6,000 vehicles using the two roads. Six thousand vehicles converging at the roundabouts and traffic		No			None	This plan clearly neglects the factor that Canvey Island has ONE ROAD OFF - The two roads converge at the waterside roundabout which causes	Highways Impacts The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	N

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											lights - another reason as to why I consider this plan not to be legally prepared and sound. I can find no plans to build additional schools (primary and secondary), dentist surgeries, GP surgeries to accommodate the proposed additional residents for these new dwellings.						issues at rush hour times and also should an incident occur - ie, broken down vehicle, vehicle involved in a RTA - The proposed number of dwellings as outline in your planning regulation would see on average - of 2 cars per dwelling an extra 6,000 vehicles using the two roads. Six thousand vehicles converging at the roundabouts and traffic lights - another reason as to why I consider this plan not to be		

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																	legally prepared and sound. I can find no plans to build additional schools (primary and secondary), dentist surgeries, GP surgeries to accommodate the proposed additional residents for these new dwellings.		
0213 - 0001	Individual	Julie	Russell		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. The draft local plan is not justified. The site selection strategy is biased and 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	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	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	Green Belt/Grey belt covered under policy GB2. All reasonable options 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 alternative for allocation) and also	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

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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.	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.					d 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 flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East	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.	Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	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.		
0213 - 0002	Individual	Julie	Russell		Yes	C4	No	The proposed number of Canvey West homes puts residents to 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

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0947 - 0001	Agent	Liam	Ryder	Roscon Group c/o CODE Development Planners Ltd	Yes	SP3	No	Within these representations CODE identify fundamental failings in CPBC's Sustainability Appraisal (SA) in relation to the appropriate consideration of reasonable alternatives. CODE is particularly concerned at the total absence of consideration for the reduced area of land east of Rayleigh Road, Thundersley (site GB13) from consideration within the SA, which is identified in other evidence	No	Positively prepared, Justified, Consistent with national policy	Paragraphs 11a) and b) of the NPPF are clear that all local plans should promote a sustainable pattern of development that seeks to meet, as a minimum, the objectively assessed needs of local planning authority, in addition to aligning growth and infrastructure. Furthermore, paragraph 61 of the NPPF emphasises the Government's objective of significantly boosting the supply of homes by aiming to meet an area's identified housing need. The NPPF therefore leaves local planning authorities in no doubt that it is expected that objectively assessed needs will be met in full. Policy SP3 outlines an intention to provide for 6,196 new homes over the period 2026 – 2043 (equivalent to 365 dwellings per annum. This is just 53% of the local housing need calculated using the government's standard method. , which is 686 dwellings per annum, or 11,662 dwellings over the same period. The NPPF is clear that “strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance.” Referring to the Planning Practice Guidance (PPG), paragraph 3 states, “The standard method should be used to assess housing needs. However it is recognised that there are some specific circumstances in which an	To be positively prepared, the Castle Point plan should, as a minimum, be planning to meet its objectively assessed housing needs. There is an acute need for new market and affordable homes across the borough.	Yes	Not Answered	Yes	A	Concerns over SA. Concerns over Duty to Cooperate.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. All reasonable sites and options were considered in the SA.	N

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								base documents (including the Green Belt Assessment, July 2025) as potentially meeting the definition of Grey Belt (and thereby not being considered to be inappropriate development in the Green Belt, subject to meeting the NPPF's golden rules). In addition to the substantial concerns regarding the SA, CODE has also identified concerns regarding the lack of clarity over CPBC's accordance with the			alternative approach could be justified, for example as explained at paragraph 14 below." Paragraph 14 refers specifically to circumstances in which strategic policy-making authority boundaries do not align with local planning authority boundaries, which is not applicable to CPBC. Furthermore, paragraph 15 considers how alternative methods will be tested at examination. The PPG states, "...in the specific circumstances where an alternative approach could be justified, such as those explained at paragraph 014, consideration will be given to whether it provides the basis for a plan that is positively prepared, taking into account the information available on existing levels of housing stock and housing affordability." The supporting text to the policy (paragraph 6.53) notes, "the suite of evidence gathered in preparation of the Plan has shown that achieving that target would significantly and irreversibly destroy large tracks of Green Belt, including land which strongly contributes to the Green Belt purposes, and undermine the approach to protecting and enhancing the natural environment set out in policy SP1, by impacting on protected areas and frustrating a landscape scale approach to green infrastructure and nature recovery." The NPPF is clear that, once								

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								Duty to Cooperate . The Duty to Cooperate evidence section on the local plan website is limited to one statement of common ground (SOCG) between CPBC and Essex County Council (ECC) in relation to land north west of Thundersley, which is acknowledged within to not be a viable option for allocation in the current local plan (and nor was it appropriate for allocation in the previously withdrawn local plan).			established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Paragraph 146 of the NPPF stipulates, “Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes...through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.” Furthermore, paragraph 148 of the NPPF stipulates that, “Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.” CPBC undertook a part 1 assessment of its Green Belt in 2018, with a further assessment prepared for the Castle Point Plan in July 2025. The Green Belt Assessment (July 2025) should, following consideration of Green Belt sites and whether any of those (or reduced areas within them) meet the definition of grey								

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								It is difficult to establish CPBC's correspondence and cooperation with its neighbours regarding requests to accommodate some of CPBC's need, particularly in light of the statements made within the Castle Point Plan, and across the evidence base, regarding perceived local constraints which (in CPBC's view) excludes Green Belt sites from consideration for allocation. Indeed, paragraph 28 of the NPPF			belt, have been followed by further consideration by CPBC of those sites as reasonable alternatives for allocation to assist in meeting the objectively assessed needs of the area. As highlighted further in these representations, CODE does not consider any such consideration has been undertaken by CPBC, which is a fundamental failing of the evidence base which demonstrates the plan is not justified, or positively prepared. In addition, CODE notes the letter received by CPBC from Matthew Pennycook MP, the Minister of State for Housing, Communities and Local Government, on 30 June 2025, further to a letter sent by CPBC on 4 April 2025 in which it highlighted concerns regarding its ability to meet the housing needs identified by the standard method. However, in the MP's response, it is stated, "I note the concerns you raise in your letter. However, I must tell you in all candour that Castle Point is not unique in facing challenges in bringing forward a local plan that meets the needs of the community... It is perfectly clear that Castle Point officers are capable of delivering a sound plan for councillors, having done so in 2022. Unfortunately, due to previous decisions to not adopt the sound plan, the authority finds itself with one of the worst plan making track records in the country and one of the oldest local plans. This puts the Council in the bottom 2% of the country.								

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								states, "In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these." The NPPF further clarifies that such statements of common ground should be made publicly			Having received substantial support, it is now your responsibility to make the decisions needed to deliver an ambitious local plan to unlock growth and secure the housing, jobs and infrastructure that Castle Point so desperately needs." The housing minister finally confirms his expectation that CPBC brings forward a plan that is capable of being found sound quickly. At the time of writing, the Castle Point Plan's approach to meeting defined housing needs is not sound. There is no justification for the alternative approach advanced by CPBC. An ambitious plan which seeks to meet defined housing needs across a portfolio of sites both on brownfield and greenfield (and thereby Green Belt) can appropriately plan for associated infrastructure improvements to facilitate the level of growth across the borough, as has been proven by the previous Local Plan found sound in 2022. The brownfield led approach will similarly fail to meet anticipated affordable housing needs. There has been a significant decrease in affordable housing being delivered in the borough (against an already abysmal record) since the introduction of CPBC's CIL Charging Schedule (adopted 1 May 2023). The enclosed appendix demonstrates several sites								

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								available throughout the plan-making process to provide transparency. The publication of one statement of common ground which relates to a specific part of the borough, and which is not included in the local plan for consideration as an allocation is not sufficient to demonstrate appropriate co-operation with neighbouring authorities. It is noted within the officer's report to Special Council			where viability assessments have been used to revise levels of affordable housing to be provided (viability assessments have been used to justify no provision of affordable housing on brownfield sites). To be positively prepared, the Castle Point plan should, as a minimum, be planning to meet its objectively assessed housing needs. There is an acute need for new market and affordable homes across the borough. Whilst there are constraints identified in the borough (and on some Green Belt land), the constraints are not 'strong' reasons for restricting the overall scale and distribution of development in the plan area (as prescribed by paragraph 11(b) of the NPPF).								

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								(for the meeting on 23 July 2025) that “The key issue which is to be finalised is a final decision from adjoining and nearby councils on whether they can accept any of the unmet need from Castle Point (between 4,736 and 6,511 dwellings). This can only be completed once the Council has published its Regulation 19 draft Castle Point Plan and has specified the level of unmet need.”											

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								However, it is important to note paragraph 26 of the NPPF which stipulates, "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that											

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								cannot be met wholly within a particular area could be met elsewhere." The Duty to Cooperate is a gateway test for the soundness and legal compliance of a local plan. In light of the requirements of paragraph 26 of the NPPF, it is not acceptable to seek to satisfy the requirements of the Duty to Cooperate post-submission as joint working between strategic policy making authorities should have been											

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								undertaken throughout the preparation of the Castle Point Plan and cannot be applied retrospectively.											

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0947 - 0002	Agent	Liam	Ryder	Roscon Group c/o CODE Development Planners Ltd	Yes	DTC	No	In addition to the substantial concerns regarding the SA, CODE has also identified concerns regarding the lack of clarity over CPBC's accordance with the Duty to Cooperate. The Duty to Cooperate evidence section on the local plan website is limited to one statement of common ground (SOCG) between CPBC and Essex County Council (ECC) in relation to land north west of Thundersley, which is acknowledged	No	Positively prepared, Justified, Consistent with national policy			Yes	Not Answered	Yes	A	Lack of evidence of 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.	N

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								ged within to not be a viable option for allocation in the current local plan (and nor was it appropriate for allocation in the previously withdrawn local plan). It is difficult to establish CPBC's correspondence and cooperation with its neighbours regarding requests to accommodate some of CPBC's need, particularly in light of the statements made within the Castle Point Plan, and across the evidence base, regarding											

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								perceived local constraints which (in CPBC's view) excludes Green Belt sites from consideration for allocation. Indeed, paragraph 28 of the NPPF states, "In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and											

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								progress in cooperating to address these.” The NPPF further clarifies that such statements of common ground should be made publicly available throughout the plan-making process to provide transparency. The publication of one statement of common ground which relates to a specific part of the borough, and which is not included in the local plan for consideration as an allocation is not sufficient to											

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								demonstrate appropriate co-operation with neighbouring authorities. It is noted within the officer's report to Special Council (for the meeting on 23 July 2025) that "The key issue which is to be finalised is a final decision from adjoining and nearby councils on whether they can accept any of the unmet need from Castle Point (between 4,736 and 6,511 dwellings). This can											

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								only be completed once the Council has published its Regulation 19 draft Castle Point Plan and has specified the level of unmet need.” However, it is important to note paragraph 26 of the NPPF which stipulates, “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy.											

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								In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular area could be met elsewhere. ” The Duty to Cooperate is a gateway test for the soundness and legal compliance of a local plan. In light of the requirements of paragraph 26 of the NPPF, it is not acceptable											

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								to seek to satisfy the requirements of the Duty to Cooperate post-submission as joint working between strategic policy making authorities should have been undertaken throughout the preparation of the Castle Point Plan and cannot be applied retrospectively.											

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0947 - 0003	Agent	Liam	Ryder	Roscon Group c/o CODE Development Planners Ltd	Yes	GB2	No	Within these representations CODE identify fundamental failings in CPBC's Sustainability Appraisal (SA) in relation to the appropriate consideration of reasonable alternatives. CODE is particularly concerned at the total absence of consideration for the reduced area of land east of Rayleigh Road, Thundersley (site GB13) from consideration within the SA, which is identified in other evidence	No	Consistent with national policy	Policy GB2 concerns previously developed land in the Green Belt only. Paragraph 17.10 of the supporting text for the policy notes the introduction of Grey Belt policy following the revision to the NPPF in December 2024. At 17.11 of the supporting text notes, "This definition in effect changes how Green Belt is defined. Appendix K sets out the Council's interpretation of key terms within the definition of previously developed land." The policy is inconsistent with the provisions of the NPPF, as it only considers development which comes forward on previously developed land in the Green Belt to 'not constitute inappropriate development.' The NPPF's Grey Belt policy does not exclude greenfield sites from meeting the definition of Grey Belt; for the purposes of plan-making and decision-taking, Grey Belt is defined as land in the Green Belt comprising previously developed land and/or any other land that does not strongly contribute to purposes a), b) and d) of the Green Belt. The wording of the policy is particularly concerning for sites which have been identified to meet the definition of Grey Belt within the evidence base supporting the Castle Point Plan, such as land east of Rayleigh Road, Thundersley (site reference GB13a), which is identified within the Green Belt Assessment for Castle Point	The policy is inconsistent with national planning policy and should be updated to reflect that residential development in the Green Belt which meets the definition of Grey Belt (and the golden rules) should not be viewed as inappropriate development.	Yes	Not Answered	Yes	A	SA of GB13 Within these representations CODE identify fundamental failings in CPBC's Sustainability Appraisal (SA) in relation to the appropriate consideration of reasonable alternatives. CODE is particularly concerned at the total absence of consideration for the reduced area of land east of Rayleigh Road, Thundersley (site GB13) from	<u>SA of GB13</u> Site GB13 was assessed in the SA. <u>Duty to Cooperate</u> Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. <u>Green Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. Where the 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.	N

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								base documents (including the Green Belt Assessment, July 2025) as potentially meeting the definition of Grey Belt (and thereby not being considered to be inappropriate development in the Green Belt, subject to meeting the NPPF's golden rules). In addition to the substantial concerns regarding the SA, CODE has also identified concerns regarding the lack of clarity over CPBC's accordance with the			Borough Council (July 2025) as potentially meeting the definition of Grey Belt. If Rosconn Group were to bring forward a planning application on the site which meets the definition of Grey Belt, in accordance with paragraph 155 of the NPPF (and, additionally the golden rules outlined in paragraphs 156 and 157) the scheme would not be able to comply with policy GB2 (and, by association, policy GB1 – Development affecting the Green Belt). The policy is therefore inconsistent with national planning policy and should be updated to reflect that residential development in the Green Belt which meets the definition of Grey Belt (and the golden rules) should not be viewed as inappropriate development.						consideration within the SA, which is identified in other evidence base documents (including the Green Belt Assessment, July 2025) as potentially meeting the definition of Grey Belt (and thereby not being considered to be inappropriate development in the Green Belt, subject to meeting the NPPF's golden rules). <u>Duty to Cooperate and Statements of Common Ground</u> The Duty		

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								Duty to Cooperate . The Duty to Cooperate evidence section on the local plan website is limited to one statement of common ground (SOCG) between CPBC and Essex County Council (ECC) in relation to land north west of Thundersl ey, which is acknowledged within to not be a viable option for allocation in the current local plan (and nor was it appropriate for allocation in the previously withdrawn local plan).									to Cooperate evidence section on the local plan website is limited to one statement of common ground (SOCG) between CPBC and Essex County Council (ECC) in relation to land north west of Thundersl ey, which is acknowledged within to not be a viable option for allocation in the current local plan (and nor was it appropriate for allocation in the previously withdrawn		

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								It is difficult to establish CPBC's correspondence and cooperation with its neighbours regarding requests to accommodate some of CPBC's need, particularly in light of the statements made within the Castle Point Plan, and across the evidence base, regarding perceived local constraints which (in CPBC's view) excludes Green Belt sites from consideration for allocation. Indeed, paragraph 28 of the NPPF									n local plan). It is difficult to establish CPBC's correspondence and cooperation with its neighbours regarding requests to accommodate some of CPBC's need, particularly in light of the statements made within the Castle Point Plan, and across the evidence base, regarding perceived local constraints which (in CPBC's view) excludes Green Belt sites from consideration for		

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								states, "In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these."									allocation . <u>Policy GB2</u> The policy is inconsistent with the provisions of the NPPF, as it only considers development which comes forward on previously developed land in the Green Belt to 'not constitute inappropriate development.' The NPPF's Grey Belt policy does not exclude greenfield sites from meeting the definition of Grey Belt; for the purposes of plan-making		

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								available throughout the plan-making process to provide transparency. The publication of one statement of common ground which relates to a specific part of the borough, and which is not included in the local plan for consideration as an allocation is not sufficient to demonstrate appropriate co-operation with neighbouring authorities. It is noted within the officer's report to Special Council									and decision-taking, Grey Belt is defined as land in the Green Belt comprising previously developed land and/or any other land that does not strongly contribute to purposes a), b) and d) of the Green Belt. The wording of the policy is particularly concerning for sites which have been identified to meet the definition of Grey Belt within the evidence base supportin		

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								(for the meeting on 23 July 2025) that “The key issue which is to be finalised is a final decision from adjoining and nearby councils on whether they can accept any of the unmet need from Castle Point (between 4,736 and 6,511 dwellings). This can only be completed once the Council has published its Regulation 19 draft Castle Point Plan and has specified the level of unmet need.”									g the Castle Point Plan, such as land east of Rayleigh Road, Thundersley (site reference GB13a), which is identified within the Green Belt Assessment for Castle Point Borough Council (July 2025) as potentially meeting the definition of Grey Belt.		

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								However, it is important to note paragraph 26 of the NPPF which stipulates, "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that											

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								cannot be met wholly within a particular area could be met elsewhere." The Duty to Cooperate is a gateway test for the soundness and legal compliance of a local plan. In light of the requirements of paragraph 26 of the NPPF, it is not acceptable to seek to satisfy the requirements of the Duty to Cooperate post-submission as joint working between strategic policy making authorities should have been											

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0947 - 0004	Agent	Liam	Ryder	Roscon Group c/o CODE Development Planners Ltd	Yes	DH1	No	Within these representations CODE identify fundamental failings in CPBC's Sustainability Appraisal (SA) in relation to the appropriate consideration of reasonable alternatives. CODE is particularly concerned at the total absence of consideration for the reduced area of land east of Rayleigh Road, Thundersley (site GB13) from consideration within the SA, which is identified in other evidence	No	Effective, Justified, Consistent with national policy	In relation to policy DH1, CODE would question the need for the policy in addition to the Green Belt designation around Daws Heath itself. In addition, policy ENV1 (protecting and enhancing the landscape and landscape features) performs a similar function. CPBC should consider deleting the policy – three interlinking policies can create difficulty for applicants in navigating local planning policy context which would reduce the likelihood of proposals being found in accordance with the development plan.	DH1 - CPBC should consider deleting the policy – three interlinking policies can create difficulty for applicants in navigating local planning policy context which would reduce the likelihood of proposals being found in accordance with the development plan.	Yes	Not Answered	Yes	A	Questioning why DH1 is needed when the land is allocated as Green Belt and ENV1 performs a similar function, should be removed	Policy DH1 is considered necessary to improve the existing situation with regards to the recreational role of the area which will be protected and enhanced with opportunities for managed passive recreation, focussing on heath, wellbeing and educational value. Projects improving managed walking and cycling connections across the wider area will also be supported. It is important to acknowledge the value to the environment of the land and does not conflict with ENV1.	N

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								base documents (including the Green Belt Assessment, July 2025) as potentially meeting the definition of Grey Belt (and thereby not being considered to be inappropriate development in the Green Belt, subject to meeting the NPPF's golden rules). In addition to the substantial concerns regarding the SA, CODE has also identified concerns regarding the lack of clarity over CPBC's accordance with the											

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								Duty to Cooperate . The Duty to Cooperate evidence section on the local plan website is limited to one statement of common ground (SOCG) between CPBC and Essex County Council (ECC) in relation to land north west of Thundersley, which is acknowledged within to not be a viable option for allocation in the current local plan (and nor was it appropriate for allocation in the previously withdrawn local plan).											

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								It is difficult to establish CPBC's correspondence and cooperation with its neighbours regarding requests to accommodate some of CPBC's need, particularly in light of the statements made within the Castle Point Plan, and across the evidence base, regarding perceived local constraints which (in CPBC's view) excludes Green Belt sites from consideration for allocation. Indeed, paragraph 28 of the NPPF											

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								states, “In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.” The NPPF further clarifies that such statements of common ground should be made publicly											

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								(for the meeting on 23 July 2025) that “The key issue which is to be finalised is a final decision from adjoining and nearby councils on whether they can accept any of the unmet need from Castle Point (between 4,736 and 6,511 dwellings). This can only be completed once the Council has published its Regulation 19 draft Castle Point Plan and has specified the level of unmet need.”											

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								However, it is important to note paragraph 26 of the NPPF which stipulates, "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that											

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								cannot be met wholly within a particular area could be met elsewhere." The Duty to Cooperate is a gateway test for the soundness and legal compliance of a local plan. In light of the requirements of paragraph 26 of the NPPF, it is not acceptable to seek to satisfy the requirements of the Duty to Cooperate post-submission as joint working between strategic policy making authorities should have been											

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0947 - 0005	Agent	Liam	Ryder	Roscon Group c/o CODE Development Planners Ltd	Yes	DH2	No	Within these representations CODE identify fundamental failings in CPBC's Sustainability Appraisal (SA) in relation to the appropriate consideration of reasonable alternatives. CODE is particularly concerned at the total absence of consideration for the reduced area of land east of Rayleigh Road, Thundersley (site GB13) from consideration within the SA, which is identified in other evidence	No	Effective, Justified, Consistent with national policy	With regard to policy DH2, the policy is inconsistent with the NPPF, particularly in relation to Grey Belt policy. Sites meet the definition of Grey Belt if they do not perform strongly against purposes a), b) and d) of the Green Belt. In relation to purpose b) (to prevent neighbouring towns merging into one another) the PPG states that the purpose relates to towns, not villages. Daws Heath is a village. Policy DH2 should therefore be revised to acknowledge that there may be circumstances where sites meet the definition of Grey Belt, and would not make a strong contribution to purpose b) as Daws Heath is not a town. Schemes would, therefore, in accordance with national planning policy and guidance, be capable of being found acceptable. Policy DH2 is therefore inconsistent with national planning policy.	DH2 - Policy DH2 should be revised to acknowledge that there may be circumstances where sites meet the definition of Grey Belt, and would not make a strong contribution to purpose b) as Daws Heath is not a town. Schemes would, therefore, in accordance with national planning policy and guidance, be capable of being found acceptable. Policy DH2 is therefore inconsistent	Yes	Not Answered	Yes	A	Policy DH2 is inconsistent with the NPPF, particularly in relation to Grey Belt policy. As Daws Heath is a village the policy should be revised to acknowledge that there may be circumstances where sites meet the definition of Grey Belt, and would not make a strong contribution to purpose b) as Daws Heath is not a town. Schemes would, therefore, in accordance with national planning	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 settlements are maintained to protect its unique identity and semi rural character.	N

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0947 - 0006	Agent	Liam	Ryder	Roscon Group c/o CODE Development Planners Ltd	Yes	SP3	No	Within these representations CODE identify fundamental failings in CPBC's Sustainability Appraisal (SA) in relation to the appropriate consideration of reasonable alternatives. CODE is particularly concerned at the total absence of consideration for the reduced area of land east of Rayleigh Road, Thundersley (site GB13) from consideration within the SA, which is identified in other evidence	No	Positively prepared	The Strategic Land Availability Assessment (SLAA) Methodology Report (January 2023) confirms that the Council has used the Urban Intelligence Place Maker tool, which relies on Land Registry data and artificial intelligence (AI) to identify vacant and underutilised land within urban areas. While AI is a tool capable of processing large datasets and identifying patterns, its outputs are only as reliable as the data inputs and prompts used to generate them. The methodology does not disclose: • What specific prompts or parameters were used, • How the AI model was trained or validated, • What safeguards were in place to prevent errors or bias, • Whether the outputs were manually reviewed or verified. Without transparency over the inputs, assumptions, and decision rules, there is a risk that the AI may have misclassified sites, particularly where land use is ambiguous or where ownership constraints exist. This is a known limitation of AI systems, especially when applied to complex spatial and legal datasets. The absence of a clear audit trail or published outputs from the AI tool undermines confidence in the robustness of the site identification process. It also raises questions about whether the SLAA meets the	To ensure soundness, the Council should publish:	Yes	Not Answered	Yes	A	Critical of Strategic Land Availability Assessment (SLAA), particularly its reliance on AI.	Noted	N

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								base documents (including the Green Belt Assessment, July 2025) as potentially meeting the definition of Grey Belt (and thereby not being considered to be inappropriate development in the Green Belt, subject to meeting the NPPF's golden rules). In addition to the substantial concerns regarding the SA, CODE has also identified concerns regarding the lack of clarity over CPBC's accordance with the			requirements of paragraph 35 of the NPPF, which demands that plans be: • Justified – based on proportionate and transparent evidence; • Consistent with the requirements of national planning policy; • Effective – ensuring that sites are deliverable over the plan period; and • Positively prepared – to meet, as a minimum, objectively assessed development needs. To ensure soundness, the Council should publish: • The prompts and parameters used in the AI tool, • A list of sites identified by AI and how they were verified, • A statement on how AI outputs were reviewed and validated by officers. Until this is provided, the SLAA cannot be considered a fully transparent or proportionate basis for site selection. In the absence of this evidence, the sites selected for allocation cannot be considered to be effective over the plan period, and the plan cannot be said to be positively prepared, as the objectively assessed needs for the borough will not be met as a minimum.								

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								Duty to Cooperate . The Duty to Cooperate evidence section on the local plan website is limited to one statement of common ground (SOCG) between CPBC and Essex County Council (ECC) in relation to land north west of Thundersley, which is acknowledged within to not be a viable option for allocation in the current local plan (and nor was it appropriate for allocation in the previously withdrawn local plan).											

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								states, “In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.” The NPPF further clarifies that such statements of common ground should be made publicly											

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								(for the meeting on 23 July 2025) that “The key issue which is to be finalised is a final decision from adjoining and nearby councils on whether they can accept any of the unmet need from Castle Point (between 4,736 and 6,511 dwellings). This can only be completed once the Council has published its Regulation 19 draft Castle Point Plan and has specified the level of unmet need.”											

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								However, it is important to note paragraph 26 of the NPPF which stipulates, "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that											

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								cannot be met wholly within a particular area could be met elsewhere." The Duty to Cooperate is a gateway test for the soundness and legal compliance of a local plan. In light of the requirements of paragraph 26 of the NPPF, it is not acceptable to seek to satisfy the requirements of the Duty to Cooperate post-submission as joint working between strategic policy making authorities should have been											

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0947 - 0007	Agent	Liam	Ryder	Roscon Group c/o CODE Development Planners Ltd	Yes	SLAA	No	Within these representations CODE identify fundamental failings in CPBC's Sustainability Appraisal (SA) in relation to the appropriate consideration of reasonable alternatives. CODE is particularly concerned at the total absence of consideration for the reduced area of land east of Rayleigh Road, Thundersley (site GB13) from consideration within the SA, which is identified in other evidence	No	Positively prepared, Justified, Consistent with national policy	The suitability of sites considered the physical circumstances of sites and policies set in the NPPF. There are 24 criteria that were used and ranged from statutory designations, Flood Risk Zones, accessibility to public transport (distance to bus stops) and noise. Very important criteria were awarded a 3 score and the least important awarded a 1 score. The full list is on pages 5-6 of the report. The SLAA (July 2025) confirms that land east of Rayleigh Road, Thundersley (Site ID 40492) is suitable, viable and available for residential development, with an indicative capacity of between 962 and 1,604 dwellings depending on assumed density. The site scores positively across the majority of assessment criteria, with no insurmountable constraints identified. Matters raised including proximity to a Local Wildlife Site, the presence of badger setts, Tree Preservation Orders, and heritage/archaeology considerations are all capable of being addressed through established and recognised forms of mitigation at the planning application stage (indeed, this was recognised by statutory consultees in relation to the previous planning application on the site – 23/0085/OUT). The Council's evidence base in respect of site GB13 is inconsistent and therefore		Yes	Not Answered	Yes	A	In respect of site "land east of rayleigh road" (ID 40492) known as GB13 the SLAA identifies that the site is suitable, viable and achievable which is not consistent with the transport assessment of the sustainability appraisal. Concern that the larger site was assessed to make it seem like it was undeliverable.	The purpose of the SLAA is not to create the strategy for the Plan, it is part of the technical evidence base for the Castle Point Plan which complements other important sources of information such as public consultation and the Sustainability Appraisal. Together these sources of evidence inform the strategic planning decision-making process. Therefore, the SLAA is not the sole source of evidence. The Castle Point Plan I Strategic Land Availability Assessment (SLAA) - July 2025 does not inform which sites should be allocated for development, but instead it contributes to the Council's understanding of what land is developable. The Green Belt assessment 2025 further assessed sub sections of sites to build upon the earlier greenbelt evidence produced in 2018. This found that in respect of sub-areas GB 13 the assessment has concluded that the	N

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								base documents (including the Green Belt Assessment, July 2025) as potentially meeting the definition of Grey Belt (and thereby not being considered to be inappropriate development in the Green Belt, subject to meeting the NPPF's golden rules). In addition to the substantial concerns regarding the SA, CODE has also identified concerns regarding the lack of clarity over CPBC's accordance with the			unsound. The SLAA identifies the site as available, suitable, and achievable, with no indication that access or transport constraints would render the site unsuitable for allocation. However, the Transport Assessment presents the site in a markedly negative light, identifying highways and access issues that are not carried through or reflected in the SLAA, Sustainability Appraisal, or wider site selection process. This discrepancy undermines the robustness of the evidence base and suggests that the site has not been assessed in a fair or consistent manner when compared with other potential allocations. The Council's evidence base (SLAA 2025, Benfleet/Hadleigh/Thundersley/Daws Heath – Site Assessments) identifies a smaller parcel, GB13a (East of Rayleigh Road), which more closely aligns with the area being promoted by the developer. Importantly, this assessment demonstrates that GB13a performs significantly better than the wider GB13 parcel, achieving a higher unmitigated suitability score of 61. The assessment finds the site to be Viable, Available (subject to confirmation), and Developable, and records that all identified constraints (such as drainage, TPOs, and archaeology) are readily mitigable through established design measures (e.g. SUDS, tree protection, archaeological recording). This contrasts with							full extent of the sub-area is not recommended for further consideration. However, it is concluded that part of the sub-area can be recommended for further consideration given that this reduced part of the sub-area would result in reduced potential harm to the Green Belt. This is further detailed within the report.	

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0947 - 0008	Agent	Liam	Ryder	Roscon Group c/o CODE Development Planners Ltd	Yes	SP3	No	Within these representations CODE identify fundamental failings in CPBC's Sustainability Appraisal (SA) in relation to the appropriate consideration of reasonable alternatives. CODE is particularly concerned at the total absence of consideration for the reduced area of land east of Rayleigh Road, Thundersley (site GB13) from consideration within the SA, which is identified in other evidence	No	Positively prepared, Effective, Justified	From reviewing the evidence base prepared in support of the Castle Point Plan, CODE has substantial doubts regarding the capacity of the urban area to accommodate the number of homes shown for allocation within policy SP3 (Meeting Development Needs). In particular, there is a lack of transparency and certainty regarding presumed capacities of sites, and their deliverability. The evidence base is confusing and does not provide the required level of clarity to ensure transparency in the assumptions applied, and how these have been assessed by CPBC to translate into housing allocations. The Development Options Technical Paper (July 2024) outlines a draft urban capacity for the borough of 3,727 new homes (net capacity of new allocations of 2,204 homes, due to uncertainties over the likelihood of residential development coming forward to replace existing business or services provided on sites + 1,523 dwellings of existing commitments). Capacities on proposed allocation sites (for the purposes of the development options technical paper) appear to have been calculated on the basis of percentage reductions based upon whether a site is currently accommodating community buildings and supermarkets (50% reduction in capacity), auto sites (25%		Yes	Not Answered	Yes	A	From reviewing the evidence base prepared in support of the Castle Point Plan, CODE has substantial doubts regarding the capacity of the urban area to accommodate the number of homes shown for allocation within policy SP3 (Meeting Development Needs). In particular, there is a lack of transparency and certainty regarding presumed capacities of sites, and their deliverability. The evidence base is	Noted	N

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								states, "In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these."			increased year-on-year, but is unlikely to capture all those in need of affordable housing, with the overall housing need likely being much greater. To add to this, the appellants' evidence demonstrates there are considerable affordability problems with house prices and rent levels in the Borough, which are increasing."								
								The NPPF further clarifies that such statements of common ground should be made publicly			Unless and until CPBC recognises the land available within the borough to accommodate new housing (and which can support the provision of much needed infrastructure across the borough), there will continue to be a substantial shortfall in affordable housing provision. The local plan as drafted is not positively prepared, justified or effective for the provision of new homes over the course of the plan period.								

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								available throughout the plan-making process to provide transparency. The publication of one statement of common ground which relates to a specific part of the borough, and which is not included in the local plan for consideration as an allocation is not sufficient to demonstrate appropriate co-operation with neighbouring authorities. It is noted within the officer's report to Special Council											

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								(for the meeting on 23 July 2025) that “The key issue which is to be finalised is a final decision from adjoining and nearby councils on whether they can accept any of the unmet need from Castle Point (between 4,736 and 6,511 dwellings). This can only be completed once the Council has published its Regulation 19 draft Castle Point Plan and has specified the level of unmet need.”											

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								However, it is important to note paragraph 26 of the NPPF which stipulates, "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that											

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								cannot be met wholly within a particular area could be met elsewhere." The Duty to Cooperate is a gateway test for the soundness and legal compliance of a local plan. In light of the requirements of paragraph 26 of the NPPF, it is not acceptable to seek to satisfy the requirements of the Duty to Cooperate post-submission as joint working between strategic policy making authorities should have been											

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0947 - 0009	Agent	Liam	Ryder	Roscon Group c/o CODE Development Planners Ltd	Yes	SP3	No	Within these representations CODE identify fundamental failings in CPBC's Sustainability Appraisal (SA) in relation to the appropriate consideration of reasonable alternatives. CODE is particularly concerned at the total absence of consideration for the reduced area of land east of Rayleigh Road, Thundersley (site GB13) from consideration within the SA, which is identified in other evidence	No	Positively prepared, Effective, Justified, Consistent with national policy	Sites like land east of Rayleigh Road, Thundersley have previously been identified as a suitable location for new housing in the borough by the very same local planning authority (and found sound further to examination) and which have been reviewed by statutory consultees who have offered no technical objections to the proposals (including from Essex County Council's highways team). Land east of Rayleigh Road is a site which can provide a significant number of new market and affordable homes (in comparison with the record of delivery in the borough since 2011). The site can come forward now to ensure that sufficient housing is provided to meet the genuine needs of local people. Land east of Rayleigh Road should therefore be considered for allocation to assist the Council in meeting its local housing needs. Whilst the site is within the Green Belt, it follows sustainable patterns of development and is located to the south of the Rayleigh Retail Park, which features a range of retail and hardware facilities, including a supermarket. The retail park also offers other employment opportunities in the form of light industrial offices, workshops and further retail space. The retail park is within a suitable walking distance from the appeal site.		Yes	Not Answered	Yes	A	Argues that Site GB13 should have been allocated.	Noted	N

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								base documents (including the Green Belt Assessment, July 2025) as potentially meeting the definition of Grey Belt (and thereby not being considered to be inappropriate development in the Green Belt, subject to meeting the NPPF's golden rules). In addition to the substantial concerns regarding the SA, CODE has also identified concerns regarding the lack of clarity over CPBC's accordance with the			There are a number of important local facilities in Thundersley, Rayleigh and Hadleigh, including schools, leisure, retail and employment. These meet many of the day-to-day needs of existing local residents in Hadleigh, reducing the need to travel outside of the Borough. The site would therefore be consistent with the NPPF's drive to promote sustainable patterns of development and the site is in accordance with, and can support, the aims outlined in paragraphs 110 to 115 of the NPPF. The overall conclusion of the Green Belt Assessment (GBA, July 2025) is that Site GB13 potentially meets the definition of Grey Belt. In our opinion, the smaller promotion site does indeed meet the definition of Grey Belt when correctly considering the sites role relative to purpose a, b and d only (rather than purpose a, b and c in the Councils July 2025 GBA), and as such therefore development is not inappropriate. The promotion site is not subject to any other designation that would restrict development relative to the designations set out at NPPF footnote 7. Furthermore, it should be noted that the site is contained by development and / or road corridors to the north, south and west and to the east the Little Haven Nature Reserve. As such, any development extent is constrained by these robust and enduring land uses								

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								Duty to Cooperate . The Duty to Cooperate evidence section on the local plan website is limited to one statement of common ground (SOCG) between CPBC and Essex County Council (ECC) in relation to land north west of Thundersley, which is acknowledged within to not be a viable option for allocation in the current local plan (and nor was it appropriate for allocation in the previously withdrawn local plan).			and designations. A medium-high landscape sensitivity rating is given in the Landscape Sensitivity and Outline Appraisal (November 2024), this again considers the whole of Site GB13. It is to be noted that the Site is not subject to any landscape designation at the local or national level, nor are views from publicly accessible vantage points across the site protected in policy terms. It is therefore considered that with a sensitive design approach, one which relates to those areas readily influenced by the existing settlement edge, development of the site could come forward in a way that minimises landscape and visual harm to the site and local level and does not harm the Green Belt purposes when considering the plan area as a whole.								

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								It is difficult to establish CPBC's correspondence and cooperation with its neighbours regarding requests to accommodate some of CPBC's need, particularly in light of the statements made within the Castle Point Plan, and across the evidence base, regarding perceived local constraints which (in CPBC's view) excludes Green Belt sites from consideration for allocation. Indeed, paragraph 28 of the NPPF											

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								states, “In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.” The NPPF further clarifies that such statements of common ground should be made publicly											

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								(for the meeting on 23 July 2025) that “The key issue which is to be finalised is a final decision from adjoining and nearby councils on whether they can accept any of the unmet need from Castle Point (between 4,736 and 6,511 dwellings). This can only be completed once the Council has published its Regulation 19 draft Castle Point Plan and has specified the level of unmet need.”											

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								However, it is important to note paragraph 26 of the NPPF which stipulates, "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that											

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								cannot be met wholly within a particular area could be met elsewhere." The Duty to Cooperate is a gateway test for the soundness and legal compliance of a local plan. In light of the requirements of paragraph 26 of the NPPF, it is not acceptable to seek to satisfy the requirements of the Duty to Cooperate post-submission as joint working between strategic policy making authorities should have been											

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0947 - 0010	Agent	Liam	Ryder	Roscon Group c/o CODE Development Planners Ltd	Yes	SP3	No	Within these representations CODE identify fundamental failings in CPBC's Sustainability Appraisal (SA) in relation to the appropriate consideration of reasonable alternatives. CODE is particularly concerned at the total absence of consideration for the reduced area of land east of Rayleigh Road, Thundersley (site GB13) from consideration within the SA, which is identified in other evidence	No	Positively prepared, Effective, Justified, Consistent with national policy	The plan is not positively prepared, justified, effective or consistent with national policy for the reasons discussed in these representations. The plan does not provide for its full, objectively assessed needs (and the justification provided by CPBC in support of an alternative strategy is insufficient and not in accordance with national planning policy). The plan is not justified by its evidence base, which, inter alia, clearly finds several sites (including land east of Rayleigh Road, Thundersley – site GB13) as being capable of meeting the definition of Green Belt (which, in accordance with national planning policy and assuming the golden rules outlined in paragraphs 156 and 157 are met) and therefore not representing inappropriate development in the Green Belt. As outlined within the NPPF (paragraph 146), exceptional circumstances for the review of Green Belt boundaries includes instances where a local planning authority cannot meet its identified need for homes. In those cases, the NPPF requires local planning authorities to review Green Belt boundaries in accordance with the policies in the Framework to propose alterations to meet those needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes of the remaining Green Belt, when		Yes	Not Answered	Yes	A	The plan is not positively prepared, justified, effective or consistent with national policy for the reasons discussed in these representations. The plan does not provide for its full, objectively assessed needs (and the justification provided by CPBC in support of an alternative strategy is insufficient and not in accordance with national planning policy). The plan is not justified	Noted	N

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								base documents (including the Green Belt Assessment, July 2025) as potentially meeting the definition of Grey Belt (and thereby not being considered to be inappropriate development in the Green Belt, subject to meeting the NPPF's golden rules). In addition to the substantial concerns regarding the SA, CODE has also identified concerns regarding the lack of clarity over CPBC's accordanc			considered across the area of the plan. As outlined in the earlier sections of these representations, where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt land which is not previously developed, and then other Green Belt locations. This exercise has plainly not been undertaken by CPBC. The Green Belt Assessment (July 2025) recommends that CPBC considers potentially altering the Green Belt boundary at 16 locations. The net change in Green Belt if all these potential alterations were implemented would be a 25.5ha reduction in Green Belt area (GB13 is included in the list of sites for further consideration). It should be noted that, in a borough which comprises 2,750ha of Green Belt land (as highlighted in paragraph 2.1.2 of the Green Belt Assessment (July 2025)), a release of 25.5ha of Green Belt land would represent just 0.927% of the total Green Belt land in CPBC. Evidently, the release of these sites, in order to meet objectively assessed housing needs, would not undermine the purposes of the remaining Green Belt across the area of the plan as a whole. Instead of considering the release of these sites, CPBC has concluded that Green Belt release would not be						by its evidence base, which, inter alia, clearly finds several sites (including land east of Rayleigh Road, Thundersl ey – site GB13) as being capable of meeting the definition of Grey Belt (which, in accordance with national planning policy and assuming the golden rules outlined in paragraphs 156 and 157 are met) and therefore not representi ng inappropriate		

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								e with the Duty to Cooperate . The Duty to Cooperate evidence section on the local plan website is limited to one statement of common ground (SOCG) between CPBC and Essex County Council (ECC) in relation to land north west of Thundersley, which is acknowledged within to not be a viable option for allocation in the current local plan (and nor was it appropriate for allocation in the previously withdrawn			appropriate in the borough. The Sustainability Appraisal contains no such assessment, and, as flagged in these representations, does not transparently assess reasonable alternatives.. In addition, the Housing Topic Paper (July 2025) states, “The Council has exhaustively explored every reasonable alternative sources of land tested against the Green Belt Review, SFRA, LNRS, Landscape Sensitivity Assessment, Site Accessibility and Suitability, Heritage Impact Assessments and the borough wide Transport Assessment. This rigorous process means the sites proposed for allocation in the Plan represent the maximum amount of land that can be released for housing without causing unacceptable harm to flood safety, biodiversity, landscape character, heritage assets or the strategic road network. Releasing any further Green Belt land would breach one or more of those constraints and is therefore neither justified nor sound under the December 2024 NPPF.” However, such a conclusion is pre-emptive and does not consider the ability of sites to overcome constraints. Paragraph 110 of the NPPF is clear that development should be focussed on locations which are, or which can be made to be sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Land east of Rayleigh Road is evidently a sustainable						development in the Green Belt. Concerns about approach to Green Belt, consistent with the NPPF. As outlined in the earlier sections of these representations, where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt land which is not previously developed, and then other Green Belt locations.		

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								local plan). It is difficult to establish CPBC's correspondence and cooperation with its neighbours regarding requests to accommodate some of CPBC's need, particularly in light of the statements made within the Castle Point Plan, and across the evidence base, regarding perceived local constraints which (in CPBC's view) excludes Green Belt sites from consideration for allocation. Indeed, paragraph 28 of the			location, in close proximity to existing services and facilities. There is an opportunity to encourage new residents towards sustainable transport opportunities, including walking and cycling, with the benefit of key services and facilities within appropriate distances. This was accepted and encouraged by Essex County Council's Highways team in response to application 23/0085/OUT. To rectify the identified concerns regarding the soundness of the local plan and its evidence base, CPBC should consider opportunities to release Green Belt land (focussing first on grey belt sites such as GB13) to meet its objectively assessed housing needs in full. Failure to do so will likely lead to the local plan being found unsound at examination, with further subsequent delays to plan making in a borough with a chronic shortfall in housing supply, particularly for affordable housing for which the need is already acute. The plan's focus on brownfield sites is not effective and will risk further worsening the acute shortfall in new housing across the borough, and in particular the existing lack of affordable housing (the affordable housing stock in the borough, in light of the right to buy, continues to decrease without a sufficient supply of new affordable homes being constructed locally. Finally, these representations identifv several instances in						This exercise has plainly not been undertaken by CPBC.		

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								NPPF states, “In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.” The NPPF further clarifies that such statements of common ground should be made			which the Castle Point Plan has not been prepared in consistency with national planning policy and guidance. The plan is therefore unsound, and CPBC should consider reviewing the plan in advance of submission for examination to ensure the plan, as a minimum, seeks to meet its objectively assessed housing needs and plans positively to invest in local infrastructure to support existing and future communities.								

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								Council (for the meeting on 23 July 2025) that “The key issue which is to be finalised is a final decision from adjoining and nearby councils on whether they can accept any of the unmet need from Castle Point (between 4,736 and 6,511 dwellings). This can only be completed once the Council has published its Regulation 19 draft Castle Point Plan and has specified the level of unmet need.”											

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								that cannot be met wholly within a particular area could be met elsewhere.” The Duty to Cooperate is a gateway test for the soundness and legal compliance of a local plan. In light of the requirements of paragraph 26 of the NPPF, it is not acceptable to seek to satisfy the requirements of the Duty to Cooperate post-submission as joint working between strategic policy making authorities should											

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								have been undertaken throughout the preparation of the Castle Point Plan and cannot be applied retrospectively. CODE therefore reserves the right to comment on the whether the duty to cooperate has been satisfied in further representations to the local plan examination, upon publication of further evidence.											
0099 - 0001	Individual	Susan	Saacs		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant,	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,	The following modifications are necessary to make the Castle Point Plan	No		No		It has failed to consider strategic alternatives like North West	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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS

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								as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			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, 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	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.					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	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 have been considered through the SFRA.	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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											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.						"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		

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																	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.		
0099 - 0002	Individual	Susan	Saac		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	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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																	procedures		
0686 - 0001	Individual	Greg	Saddington		Yes	SP3	No	The overpopulation of canvey island is a health risk to islanders in the event and evacuation is required. Adding additional properties breaches the duty of care to residents.	No	Effective, Justified	There is ONE exit from canvey that all 40000 population need to use. The infrastructure on any measures cannot cope with a further increase in population	New exit from canvey separate from waterside roundabout	No	Not Answered	Not Answered		Emergency Evacuation Third Road off Canvey	Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/ Third Road off 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 Essex Local Transport Plan 4, which within the	N

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																		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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0033 - 0001	Individual	Linda	Sadler		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	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	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 vulnerability	Not Stated		No	A	Objections on: • 5 Year housing supply - Not identified as required under NPPF 78. • 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. Comments on: • Concerns with infrastructure capacity and	• 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. • Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP)). • Access to the Borough, esp. Canvey: The plan has been subject to detailed Transport Assessment, including Canvey,	N

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								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			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 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)	ities, 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. Essex County Council is investing in infrastructure and would be legally obliged to						pressure to accommodate growth, particularly on Canvey. • Canvey: Concerns over flood risk. • Concerns with lack of access to the Borough, and Canvey in particular. • Green Belt: Welcome decision not to include green belt sites. • North West Thundersley should have been included	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. Comments noted.	

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								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			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 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	cooperate . North West Thundersley offers a strategic opportunity for sustainable growth.							

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								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			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,								

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								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 constructiv				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. 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							

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								e 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			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, 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								

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								ire 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			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 demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous								

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								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 undermini			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 Fairglens 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,								

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								ng 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			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								

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								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.			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. 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								

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								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			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.								

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								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;											

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								they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											
0033 - 0002	Individual	Linda	Sadler		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	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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								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											

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								risks being found unsound on procedural grounds alone.											
0608 - 0001	Individual	Sylvia	Sains		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	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 towards no greenbelt. Over development of brownfield sites. No Green/Grey Belt sites considered. Canvey west homes put Canvey East homes at	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 increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the	N

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											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.							risk with emergency evacuation procedures Need for a third road to be included in the plan. 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 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	

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																		transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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	

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

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																		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 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	

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																		Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0608 - 0002	Individual	Sylvia	Sains		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	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 commitments. Full details of the 480 existing commitment can be found within the housing	N

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																	the site environment for local residents 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 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.		

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0608 - 0003	Individual	Sylvia	Sains		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
1276 - 0001	Individual	Roger	Sains			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	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	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					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	<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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								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.			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	, 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.					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	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 addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u>	

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																	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	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.	
1276 - 0002	Individual	Roger	Sains			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy									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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								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.											
1276 - 0003	Individual	Roger	Sains			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	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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																	East Canvey		
0393 - 0001	Individual	Terence	Salter		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. Total housing target of 11,000.					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	<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> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	policy". Site selectiction 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	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>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey 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	

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																	infrastructure.	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.	
0393 - 0002	Individual	Ternance	Salter		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

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0393 - 0003	Individual	Ternence	Salter		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Effective, Consistent with national policy							No five year housing land supply North west thundersley was not considered	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 placed, 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	N

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																		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 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	

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																		option 4) outlines why North West Thundersley was not preferred.	
0278 - 0001	Individual	Anthony	Salton	Cartec Garage Ltd	Yes	B8	No		No	Not Stated	I am a local business on the Manor Trading Estate and have had a presence on the estate for years. I record here that Cartec Garage Ltd agrees with G&K Groundworks Ltd that the regulation 19 draft as presented is Unsound. For the record and as relayed in G&K Groundworks Ltd submission 1. CPBC have never engaged with me / my business about our future on this estate. 2. Have never informed as is on the council's regeneration web page at priority No 4 that CPBC intends to build houses on the Manor Trading Estate and move all the businesses on the MTE North of the Borough 3. I presume CPBC intends to compulsorily purchase my operational property! Again, I have not been consulted at all ! This is very worrying and concerning. I am certainly more confused now! Where am I going to be re-homed? This Regulation 19 along with the recent green belt review indicates that the area North where we are moving to, has been identified as GB16		No		Yes, attached is G&K Groundworks Ltd's response to the consultation		Our network does not extend to the Castle Point Plan area. The nearest access points to the SRN (M25 Junction 29 and Junction 30 and the A13/A1089 junction) are approximately 12 miles from the Castle Point boundary, via the A127 and A13 respectively.	Comments noted	N

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											and has been discounted as it is not a viable! Option. I would like to record my total disbelief that CPBC along with our local councillors think it's OK to treat us the MTE business community with total disrespect. Suffice – I record again that this draft plan is unsound as it has not engaged with the business on the MTE at all. Albeit we are the drivers of the local economy. Perhaps CPBC might remove that Regeneration Priority Frightening Statement and actually support the local business						Given the locations of the development, we anticipate that much of the traffic generated would be contained within the Castle Point boundary and the surrounding area. Whilst it is unlikely that the development would generate significant new trips on the A13 and M25, we note that Policy C5 is focused on improving access to and around Canvey Island. It is acknowledged that the A13 and A130 are key access		

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																	points into Canvey Island and that the junctions and a feasibility study will be carried out to identify their options for improving access to, from and within Canvey Island, including its wider strategic implications. Some key collaboration partners are identified although National Highways is not mentioned specifically.		
1324 - 0001	Individual	Irene	Sambrook			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		No				Policy HOU5 should make provision for improved	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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											allow further development which improves the overall site environment for the local residents.						site environment for the local residents		
1324 - 0002	Individual	Irene	Sambrook			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 common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the 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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																		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 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	

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																		Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. 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 capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that	

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																		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. 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 design Guide for Essex. Canvey SuDS options have been	

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																		considered through the SFRA.	
1324 - 0003	Individual	Irene	Sambrook			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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0254 - 0001	Individual	Cheryl	Sammons		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 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 e.g. Greenbelt / Grey Belt 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. Other examples of Canvey not being a viable alternative location are: Road network is already strangled by high volumes of traffic, in particular during rush hour periods. To address this would not only require the much needed third road being built but a major reworking of the existing routes so that they do converge at Waterside roundabout and more lanes being added. Also Sadlers farm roundabout was poorly designed as the route off the A13 is only 2 lanes and therefore includes traffic going to North and South Benfleet and the traffic going to Canvey has to sit in a queue and then negotiate 2 sets of traffic lights before		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	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. 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.	N

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											getting onto a Canvey Way (aka Remembrance Avenue) which is only a single land road. The health care is also already stretched and without additional Doctors/Dentists etc would not be able to provide adequate care for the residents. Investment would require to be made in additional schools in particular another secondary school would be essential, as the demolition of Furtherwick Park school to facilitate the relocation of Castleview School reduced this from 3 to 2. Has the bus and train routes been considered as with this number of additional residents commuter routes will become overcrowded and potentially unusable? This list is by no means exhaustive but a mere example of some of the issues that will require to be considered before approving the proposed plan.						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 procedure	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 place great weight on the recommendation provided by the HSE. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP). 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	

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																	s. Canvey: Concern over traffic impacts, public transport, healthcare and education .	to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
0254 - 0002	Individual	Cheryl	Sammons		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

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1105 - 0001	Individual	Mr	Sammons			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 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 e.g. Greenbelt / Grey Belt 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. Other examples of Canvey not being a viable alternative location are: Road network is already strangled by high volumes of traffic, in particular during rush hour periods. To address this would not only require the much needed third road being built but a major reworking of the existing routes so that they do converge at Waterside roundabout and more lanes being added. Also Sadlers farm roundabout was poorly designed as the route off the A13 is only 2 lanes and therefore includes traffic going to North and South Benfleet and the traffic going to Canvey has to sit in a queue and then negotiate 2 sets of traffic lights before	No five year housing land supply				A	Doesn't meet the housing target Flood risk on Canvey Third road Infrastructure	Doesn't meet the housing target 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. While the Plan does not meet the standard method housing requirement, this does not automatically mean that it is not sound. A sound plan must be based on a robust and credible evidence base and reflect the realities and constraints of the area. The proposed housing figure is justified by robust evidence which the Council will set out during the examination. Flood risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood	N

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											getting onto a Canvey Way (aka Remembrance Avenue) which is only a single land road. The health care is also already stretched and without additional Doctors/Dentists etc would not be able to provide adequate care for the residents. Investment would require to be made in additional schools in particular another secondary school would be essential, as the demolition of Furtherwick Park school to facilitate the relocation of Castleview School reduced this from 3 to 2. Has the bus and train routes been considered as with this number of additional residents commuter routes will become overcrowded and potentially unusable? This list is by no means exhaustive but a mere example of some of the issues that will require to be considered before approving the proposed plan.							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. 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	

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																		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 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	

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																		Infrastructure Delivery Plan (IDP).	
1105 - 0002	Individual	Mr	Sammons			C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated						A	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
0923 - 0001	Individual	Margaret	Sandrock		Yes	SP3	Yes		No	Justified	Whilst, no doubt, the plan is legally compliant, there is much that seems to be unrealistic. The traffic situation on Canvey Island, which is referred to in the section noted, is appalling! It is bad elsewhere, but the one key point, Waterside Farm	I'm sure you have consulted legal persona, so it is probably legally	Yes	Not Answered	Not Answered	A	No houses on Canvey until a third road has been built	Third road on Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending	N

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											roundabout, bearing the whole of the traffic going off the Island, is unworkable now, and if more houses are built, will cause a longer stand still than is already the case. If each new house has two cars, which many homes do, and people work off the Island, this roundabout will not be navigable. We cannot justify, to current residents, the building of more houses and the council should stand firm against any future development until government provide a second route - I use the term advisedly because there is only one exit - off the Island! The answer is not to sanction any planning for new builds!	compliant already!							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 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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0803 - 0001	Individual	Remo	Santi		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant ,	Support noted.	N
0821 - 0001	Individual	Gillian	Santi		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant ,	Support noted.	N
0322 - 0001	Individual	Oleg	Sarani			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 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 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,	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound: Consider North West Thundersley Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.					Doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines . Has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. Over development of	<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	N

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											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.	An assessment specifically around Canvey Island with flood zones being assessed and the impact these numbers would have on flooding					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.	preferred. <u>Green Belt/Grey belt</u> covered under policy GB2. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	
0040 - 0001	Individual	Deborah	Satchell		Not Stated	Whole Plan	Yes	I'm writing to confirm my support for the Castle Point Local Plan Regulation 19. After reading the draft, I believe it is legally sound, well prepared, and in line	Yes	Yes			Not Stated		No	A	Supports the Plan. It is legally sound, well prepared, and in line with national planning policy. It sets out a clear approach for sustainable	Support noted.	N

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								with national planning policy. It sets out a clear approach for sustainable development across the borough. in my opinion the evidence gathered for the Plan is strong, the policies are reasonable, and the proposals are achievable within the timescales given. I think it's a balance between the need for new housing, the delivery of infrastructure, and the protection of the local environment. This should									development across the borough. Evidence is strong, the policies are reasonable, and the proposals are achievable within the timescales given. Meets needs for new housing, the delivery of infrastructure, and the protection of the local environment.		

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								provide lasting benefits for both current residents and future generations. For these reasons, I'd like to place on record my support for the Castle Point Local Plan Regulation 19 and my view that it is legally sound											

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1013 - 0001	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	SP1	Yes		Yes		Anglian Water supports the policy requirements regarding new opportunities for green and blue infrastructure (GBI) and the multi-functional benefits well designed GBI can bring to existing and new communities, particularly in terms of climate resilience and minimising the impacts of pollution - including improved water quality. A successful trial by Anglian Water in partnership with Essex County Council, led to Park Avenue becoming the first street in Essex to have new “rain gardens” installed in 2021 to help reduce the risk of flooding. These are attractive Sustainable Urban Drainage Systems (SuDS) - that help retain water and allow it slowly to soak away and holding surface water away from the road and people’s homes. Thirty native trees were planted in the greenspace, and over 1,300 plants in the rain gardens to help to reduce localised flooding in the area and provide an environmentally positive solution for the local community. In addition, Anglian Water has delivered a new mycelium wetland at Benfleet water recycling centre (WRC), in partnership with the University of Essex who will be monitoring the performance of this innovative wetland design. This wetland is designed to treat		No	Not Answered	Not Answered	A	Anglian Water supports the policy requirements regarding new opportunities for green and blue infrastructure (GBI) and the multi-functional benefits well designed GBI can bring to existing and new communities, particularly in terms of climate resilience and minimising the impacts of pollution - including improved water quality. Anglian Water have completed successful	Support noted	N

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											settled storm discharge from the WRC using nature-based solutions that increase biodiversity, improve water quality, and reduce the algal bloom to allow the protected salt marshes (Ramsar and SSSI sites) to thrive. Further information can be found here: https://www.catchmenttocoast.uk/places/benfleet-creek/ We therefore endorse the creation of GBI either retrofitting in existing communities as part of redevelopment and urban regeneration opportunities and creating GBI in new developments. Our Advanced WINEP investment for AMP8 aims to demonstrate an approach to maximise value by going even further for the environment through partnership working (including leveraging significant partnership funding), focus on the use of nature-based solutions, implementing solutions to water management challenges at scale, and improved multi-stakeholder governance. The ways of working development through the partnership centre of excellence will be applied to the delivery of our overflows WINEP obligations in Great Yarmouth and Southend. We are aiming to deliver 100% green solutions in partnership - achieving both						l trials in partnership with Essex County Council, installing “rain gardens” SuDS help reduce the risk of flooding. In addition, Anglian Water has delivered a new mycelium wetland at Benfleet water recycling centre (WRC), in partnership with the University of Essex who will be monitoring the performance of this innovative wetland design. Anglian Water therefore endorse the creation		

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											positive overflow outcomes and wider benefits such as flood mitigation. It is hoped that learning from A-WINEP can be applied to other areas in the future, to demonstrate that partnership funding opportunities can provide significantly greater social, environmental, and economic benefits to an area.						of GBI either retrofitting in existing communities as part of redevelopment and urban regeneration opportunities and creating GBI in new developments.		
1013 - 0002	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	SP4	Yes		Yes		Anglian Water supports the policy requirement to demonstrate that there is sufficient appropriate infrastructure capacity to support development proposals, and that this capacity will be sustainable in both physical and financial terms. It is considered that this policy is consistent with Policy SD9 in terms of the need for proposals to demonstrate there is adequate foul water treatment and drainage infrastructure to serve the development.		No	Not Answered		A	Anglian Water supports the policy requirement to demonstrate that there is sufficient appropriate infrastructure capacity to support development proposals, and that	Support noted	N

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																	this capacity will be sustainable in both physical and financial terms. It is considered that this policy is consistent with Policy SD9 in terms of the need for proposals to demonstrate there is adequate foul water treatment and drainage infrastructure to serve the development.		
1013 - 0003	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	C1	Yes		Yes		Anglian Water supports the policy requirements, and considers the policy sound in principle, regarding town centre greening and managing flood risk through urban greening, water capture schemes and appropriate use of materials. Anglian Water has been involved in partnership schemes to retrofit SuDS in Canvey to address surface water flood risk in the town, and therefore we	Anglian Water recommends that the policy should identify the need for SuDS (consistent with Policy SD3),	No	Not Answered		A	Anglian Water supports the policy requirements, and considers the policy sound in principle, regarding town centre	Policy SD3 requires all new development to incorporate water management measures to reduce surface water run-off or adverse impact on water quality and ensure that it does not increase flood risk elsewhere. Policy SD3 also states that the	Policy C1 - Canvey Town Centre Amendment to Part 11 The inclusion of appropriate SuDs to manage surface water flood

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											consider that future growth and redevelopment of sites in the town should include appropriate SuDS through urban greening to provide overall betterment for the existing community. These types of schemes can provide additional opportunities for regeneration including enhanced public realm, positive health and wellbeing benefits, improving biodiversity and air quality. Anglian Water would welcome engagement in the preparation of the Canvey Town Centre Master Plan to assist with the appropriate management of surface water, following the drainage hierarchy.	particularly nature-based solutions such as rain gardens. The Urban Greening Scenario set out in the SFRA Surface Water Modelling Technical Note identifies that the potential impact of SuDS interventions could result in 10% reduction in contributing flows from the urban drainage network. Although this is not seen to have a significant impact on flood risk in Canvey Island, we would welcome further investigati					greening and managing flood risk through urban greening, water capture schemes and appropriate use of materials. Anglian Water has been involved in partnership schemes to retrofit SuDS in Canvey to address surface water flood risk in the town, and therefore we consider that future growth and redevelopment of sites in the town should include appropriate SuDS through	principal method to do so should be the use of Sustainable Drainage Systems (SuDS). Supporting paragraph 21.37 states that ‘Well-designed SuDS can contribute significantly towards the urban greening factor requirements set out in policy ENV3 SuDS can also contribute to climate change adaption and water efficiency, through provision of rainwater harvesting to assist in water capture to reducing risk of flooding and reduce water demand’. Policy C1 part 11 notes that the new Canvey Town Centre Master Plan will identify ‘Opportunities for managing flood risk through greening, water capture schemes and the appropriate use of materials.’ This could be further amended.	risk in the town, to provide betterment for the community via urban Opportunities for managing flood risk through greening, water capture schemes and the appropriate use of materials to enhance the public realm, health, wellbeing, biodiversity and air quality

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												on on what measures would benefit the area.					urban greening to provide overall betterment for the existing community. These types of schemes can provide additional opportunities for regeneration including enhanced public realm, positive health and wellbeing benefits, improving biodiversity and air quality. Anglian Water would welcome engagement in the preparation of the Canvey Town Centre Master Plan to assist with the appropriate		

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																	te management of surface water, following the drainage hierarchy.		
1013 - 0004	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	C4	Yes		No	Effective	The proposal to concentrate significant growth on Canvey Island is underpinned by the SFRA Level 1 and 2 and supporting technical notes. Whilst we are aware of the challenges that tidal and surface water flood risk present, we consider that the Environment Agency and Lead Local Flood Authority (LLFA), are best placed to advise on the principle of whether these risks can be managed through suitable adaptation and mitigation measures, identified in the SFRA reports, and the recommendations proposed. Anglian Water considers that proposals for the densification of West Canvey would require a surface water drainage strategy to demonstrate the effective management of surface water flood risk across the site, with the priority for reuse and SuDS in accordance with the drainage hierarchy, and consistent with the requirements of Policy SD3. Our sewerage networks can be adversely affected by surface water flooding, which can cause further impacts such as hydraulic overloading – leading to spills and pollutions. Connection to our surface water sewer network should be the	Policy C4 should require a surface water drainage strategy to demonstrate the effective management of surface water flood risk across the site, with the priority for reuse and SuDS in accordance with the drainage hierarchy, and consistent with the requirements of Policy SD3. The supporting text	No	Not Answered		A	The proposal to concentrate significant growth on Canvey Island is underpinned by the SFRA Level 1 and 2 and supporting technical notes. Whilst we are aware of the challenges that tidal and surface water flood risk present, we consider that the Environment Agency and Lead Local Flood Authority	Mods proposed	Policy C4 - West Canvey Modification to Policy: New Paragraph 2. A surface water drainage strategy to demonstrate the effective management of surface water flood risk across the site, with the priority for reuse and SuDS in accordance with the drainage hierarchy. Modifications to Supporting Text 8.39 To ensure environmental quality,

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											final option for discharge, if all other options are demonstrated to be infeasible. Our surface water guidance sets out our approach to different development scenarios. Reference to urban greening and the introduction of sustainable drainage is made in paragraph 8.39 of the supporting text, and pre-application discussions with the Lead Local Flood Authority. We would therefore expect the policy to reflect this approach in more specific terms or at least refer the need for compliance with Policy SD3. Moreover, the supporting text should also reference the need for pre-application engagement with Anglian Water if a connection to the public surface water sewerage system is proposed.	should also reference the need for pre-application engagement with Anglian Water if a connection to the public surface water sewerage system is proposed.					(LLFA) are best placed to advise on the principle of whether these risks can be managed through suitable adaptation and mitigation measures, identified in the SFRA reports, and the recommendations proposed. Anglian Water considers that proposals for the densification of West Canvey would require a surface water drainage strategy to demonstrate the effective		and to reduce the risks of adverse impacts from surface water, hydraulic overloading and pollution, it is expected that the regeneration of west Canvey will include urban greening and the introduction of sustainable drainage. must be supported by a surface water drainage strategy. The Strategy will be fully informed by engagement with key partners including the Environment Agency, Water utilities companies and Essex County

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																	management of surface water flood risk across the site, with the priority for reuse and SuDS in accordance with the drainage hierarchy, and consistent with the requirements of Policy SD3. Our sewerage networks can be adversely affected by surface water flooding, which can cause further impacts such as hydraulic overloading – leading to spills and pollutions . Connection to our surface water		Council (as Lead Local Flood Authority) and will prioritise consideration of SuDS and urban greening. 8.40 SuDS should be the principal but may not be the only method. SuDs are often most viable when considered early in the design process, so developers are encouraged to engage in preapplication discussions with Essex County Council (as Lead Local Flood Authority), and refer to ECC's SuDS Design Guide, and any future updates, when preparing applications

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																	sewer network should be the final option for discharge , if all other options are demonstrated to be infeasible. Our surface water guidance sets out our approach to different development scenarios. Reference to urban greening and the introduction of sustainable drainage is made in paragraph 8.39 of the supporting text, and pre-application discussions with the Lead Local Flood		incorporating SuDS schemes. These are critical to address the impacts of climate change in an urbanised environment and especially in a low-lying area such as Canvey. Furthermore , it is expected that the development will integrate with multi-functional green infrastructure in the area such as Canvey Wick SSSI and west Canvey Marshes to provide recreation and time in nature opportunities for residents. Developers should engage with Anglian Water as

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																	Authority. We would therefore expect the policy to reflect this approach in more specific terms or at least refer the need for compliance with Policy SD3. Moreover, the supporting text should also reference the need for pre-application engagement with Anglian Water if a connection to the public surface water sewerage system is proposed. Proposed Modifications: Policy C4 should require a		early in the process as possible, if a connection to the public surface water sewerage system is proposed).

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																	surface water drainage strategy to demonstrate the effective management of surface water flood risk across the site, with the priority for reuse and SuDS in accordance with the drainage hierarchy, and consistent with the requirements of Policy SD3. The supporting text should also reference the need for pre-application engagement with Anglian Water if a connection to the public		

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																	surface water sewerage system is proposed.		
1013 - 0005	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	Policies Map	Yes		No	Justified	Anglian Water supports the principle of the Green Lung designation in helping to support nature recovery on Canvey Island and consistency with the aims of the Local Nature Recovery Strategy for Essex. However, whilst our Canvey Island water recycling centre (WRC) is mainly excluded from the Green Lung designation on the Policies Map, it does not reflect all our operational land for this site. Our landownership for Canvey Island WRC extends further than shown on the Policies Map and includes part of the access to our site and a strip of land that contains the final effluent pipe extending from the south of the WRC to the coastline.	Anglian Water requests that the Policies Map excludes the entirety of our WRC operational land from the land indicated as 'Green Lung' (and any overlapping area identified as 'Park Homes' sites) to ensure that future operational or engineeri	No	Not Answered		A	Modification: Policies Map to be modified in accordance with Anglian Water operational land/land ownership mapping, as illustrated on the SoCG:	Modification: Policies Map to be modified in accordance with Anglian Water operational land/land ownership mapping, as illustrated on the SoCG:	Y - Policies Map to be modified in accordance with Anglian Water operational land/land ownership mapping, as illustrated on the SoCG:

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												ng works required in relation to maintaining or improving our essential wastewater infrastructure is not constrained by the designation. Anglian Water can provide the Council with details of our operational land/land ownership for this site to assist with accuracy of the Policies Map and the attributed land designations.							

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1013 - 0006	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	Chapter 9	Yes		Yes		NOTE Consistency issue: Anglian Water recognises there are a number of redevelopment and regeneration opportunities within the town, at various sites. Some of the site allocation policies (Policy B3, B5, B6) includes the requirement that "the development proposal is compliant with all other relevant policies of this Plan"; however, none of the other site allocations for Benfleet include this requirement. We question whether all allocation policies require this criterion to ensure that the plan is read as a whole, or whether specific policy requirements such as the submission of a surface water drainage strategy should be specifically included? Similarly, the supporting text (paragraph 9.30) Policy B8 Manor Trading Estate references the inclusion of urban greening and introduction of sustainable drainage, but the policy includes no such requirement. The SFRA Level 2 recommendations stated that for all proposed development sites "peak surface water runoff rate from the development must be as close as reasonable practicable to the greenfield runoff rate...[and] Development proposals must demonstrate that the surface water will be managed and discharged from the site in accordance with the drainage hierarchy." This would suggest that either all the policies require the submission of a surface water drainage strategy that demonstrates that	Consistency issue between policies in relation as to whether a surface water drainage strategy should be required or a clause requiring "development proposals to be compliant with all other relevant policies of this Plan".	No	Not Answered		A	NOTE Consistency issue: Anglian Water recognises there are a number of redevelopment and regeneration opportunities within the town, at various sites. Some of the site allocation policies (Policy B3, B5, B6) includes the requirement that "the development proposal is compliant with all other relevant policies of this Plan"; however, none of the other site allocations for Benfleet	NPPF paragraph 16 states that Plans should avoid unnecessary duplication of policies that apply to a particular area. Policies should not be read in isolation, and the Castle Point Plan is to be read as a whole.	<u>Modification to policies B5 and B6</u> Remove sentence 'The proposal is compliant with all other relevant policies of this Plan' Note the similar sentence in Policy B3 is retained since it specifically also refers to another policy (B2).

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											peak surface water runoff rates are no greater than equivalent greenfield run-off rates and the discharge of the surface water should be managed in accordance with the drainage hierarchy OR are consistent with the requirements of Policy SD3.						include this requirement. We question whether all allocation policies require this criterion to ensure that the plan is read as a whole, or whether specific policy requirements such as the submission of a surface water drainage strategy should be specifically included? Similarly, the supporting text (paragraph 9.30) Policy B8 Manor Trading Estate references the inclusion of urban		

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																	greening and introduction of sustainable drainage, but the policy includes no such requirement. The SFRA Level 2 recommendations stated that for all proposed development sites "peak surface water runoff rate from the development must be as close as reasonably practicable to the greenfield runoff rate...[and] Development proposals must demonstrate that the surface		

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																	water will be managed and discharged from the site in accordance with the drainage hierarchy. " This would suggest that either all the policies require the submission of a surface water drainage strategy that demonstrates that peak surface water runoff rates are no greater than equivalent greenfield run-off rates and the discharge of the surface water should be		

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																	managed in accordance with the drainage hierarchy OR are consistent with the requirements of Policy SD3.		
1013 - 0007	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	HAD4	Yes		Yes		NOTE Consistency issue: Anglian Water recognises there are a number of redevelopment and regeneration opportunities within the town, at various sites. This site allocation policy includes the requirement that "the development proposal is compliant with all other relevant policies of this Plan"; however, none of the other site allocations for Hadleigh include this requirement. We question whether all allocation policies require this criterion to ensure that the plan is read as a whole, or whether specific policy requirements such as the submission of a surface water drainage strategy (in accordance with Policy SD3) is required. Whilst surface water flood risk is not identified in the supporting text the SFRA Level 2 recommendation suggests all proposed development sites would need to demonstrate that surface water run-off is managed and discharged in accordance with the drainage hierarchy.	Consistency issue between Hadleigh site allocation policies in relation as to whether a surface water drainage strategy should be required or a clause requiring "development proposals to be compliant with all other relevant policies of this Plan".	No	Not Answered		A	Consistency issue: Anglian Water recognises there are a number of redevelopment and regeneration opportunities within the town, at various sites. This site allocation policy includes the requirement that "the development proposal is compliant with all other relevant policies of this Plan". Modification to Policy Had4 Remove sentence 'The proposal is compliant with all other relevant policies of this Plan' Note This is done for consistency between policies	Agreed in Anglian Water SoCG as unnecessary and inconsistent with other policies. NPPF paragraph 16 states that Plans should avoid unnecessary duplication of policies that apply to a particular area. Policies should not be read in isolation, and the Castle Point Plan is to be read as a whole. Remove sentence 'The proposal is compliant with all other relevant policies of this Plan' Note This is done for consistency between policies	Y Policy Had4 Remove sentence 'The proposal is compliant with all other relevant policies of this Plan' Note This is done for consistency between policies.

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																	relevant policies of this Plan"; however, none of the other site allocations for Hadleigh include this requirement. We question whether all allocation policies require this criterion to ensure that the plan is read as a whole, or whether specific policy requirements such as the submission of a surface water drainage strategy (in accordance with Policy SD3) is required. Whilst surface		

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																	water flood risk is not identified in the supporting text the SFRA Level 2 recommendation suggests all proposed development sites would need to demonstrate that surface water run-off is managed and discharged in accordance with the drainage hierarchy.		
1013 - 0008	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	THUN 2	Yes		Yes		NOTE Consistency issue: Anglian Water recognises there are redevelopment and regeneration opportunities within the town, at various sites. This site allocation policy and Policy Thun 3 includes the requirement that "the development proposal is compliant with all other relevant policies of this Plan". We question whether all allocation policies require this criterion to ensure that the plan is read as a whole, or whether specific	Consistency issue between Thundersley site allocation policies in relation as to whether a surface water drainage strategy should be	No	Not Answered		A	NOTE Consistency issue: Anglian Water recognises there are a number of redevelopment and regeneration opportunities within	Modification to policies Thun2 and Thun3 . Remove sentence 'The proposal is compliant with all other relevant policies of this Plan' Note This is done for consistency between policies.	Modification to policies Thun2 and Thun3 . Remove sentence 'The proposal is compliant with all other relevant policies of this Plan'

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											policy requirements such as the submission of a surface water drainage strategy (in accordance with Policy SD3) is required. Similarly, surface water flood risk is identified in the supporting text (para 11.16). The SFRA Level 2 recommendation suggests all proposed development sites would need to demonstrate that surface water run-off is managed and discharged in accordance with the drainage hierarchy.	required or a clause requiring "development proposals to be compliant with all other relevant policies of this Plan".					the town, at various sites. This site allocation policy includes the requirement that "the development proposal is compliant with all other relevant policies of this Plan"; however, none of the other site allocations for Hadleigh include this requirement. We question whether all allocation policies require this criterion to ensure that the plan is read as a whole, or whether		Note This is done for consistency between policies.

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																	specific policy requirements such as the submission of a surface water drainage strategy (in accordance with Policy SD3) is required. Whilst surface water flood risk is not identified in the supporting text the SFRA Level 2 recommendation suggests all proposed development sites would need to demonstrate that surface water run-off is managed and discharged in accordance		

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																	ce with the drainage hierarchy.		
1013 - 0009	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	SD1	Yes		Yes		NOTE: It is noted that the regeneration and redevelopment of brownfield sites on Canvey Island (Flood Zone 3a) will have to meet the Sequential Test and where appropriate the Exceptions Test. Whilst the measures in the policy are to ensure that new development is designed to be flood resistant and resilient, the supporting infrastructure, such as sewerage infrastructure, is likely to require significant investment and capital carbon in new infrastructure and ongoing maintenance, but will undoubtedly be at a much higher risk from the impacts of tidal flooding due to the fact our infrastructure is underground, and vulnerable to flood events.		No	Not Answered		A	NOTE: It is noted that the regeneration and redevelopment of brownfield sites on Canvey Island (Flood Zone 3a) will have to meet the Sequential Test and where appropriate the Exceptions Test. Whilst the measures in the policy are to ensure that new development is designed to be flood resistant and resilient, the supportin	Noted	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. 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
																	g infrastructure, such as sewerage infrastructure, is likely to require significant investment and capital carbon in new infrastructure and ongoing maintenance, but will undoubtedly be at a much higher risk from the impacts of tidal flooding due to the fact our infrastructure is underground, and vulnerable to flood events		
1013 - 0010	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	SD2	Yes		Yes		NOTE: Whilst Anglian Water is a Risk Management Authority in terms of managing flood risks from our infrastructure, we also need to be cognisant of the impacts of new development and other forms of flood risk, such as surface water and groundwater flooding, on the		No	Not Answered		A	NOTE: Whilst Anglian Water is a Risk Management Authority in terms	Policy SD2(9) relates to Policy SD3(1). SD3(1) states that 'all new development will be required to incorporate water management measures to reduce	N

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											resilience of our sewerage infrastructure, given our duty to ensure the area we serve is 'effectively drained'. We support the requirement for all development to integrate SuDS to contribute to the management of surface water flood risk - however this is contradicted in Policy SD3 by applying to all 'major' development (see our representation to Policy SD3). Supporting infrastructure for new housing and employment growth, such as our sewerage infrastructure, is likely to require significant investment and capital carbon in delivering new infrastructure and ongoing maintenance but will undoubtedly be at a much higher risk from the impacts of surface water flooding due to the fact our infrastructure is underground, and therefore vulnerable to flood events.						of managing flood risks from our infrastructure, we also need to be cognisant of the impacts of new development and other forms of flood risk, such as surface water and groundwater flooding, on the resilience of our sewerage infrastructure, given our duty to ensure the area we serve is 'effectively drained'. We support the requirement for all development to integrate SuDS to contribute to the	surface water run-off or adverse impact on water quality and ensure that it does not increase flood risk elsewhere'. It further continues that 'The principal method to do so should be the use of Sustainable Drainage Systems (SuDS).' It is therefore considered implicit in both SD2 and SD3 that SuDS is required for all development. The reference to 'major' development in the consulted version of Policy SD3 relates to the requirement to submit a full drainage strategy, rather than SuDS.	

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																	management of surface water flood risk - however this is contradicted in Policy SD3 by applying to all 'major' development (see our representation to Policy SD3). Supporting infrastructure for new housing and employment growth, such as our sewerage infrastructure, is likely to require significant investment and capital carbon in delivering new infrastructure and		

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																	ongoing maintenance but will undoubtedly be at a much higher risk from the impacts of surface water flooding due to the fact our infrastructure is underground, and therefore vulnerable to flood events.		

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1013 - 0011	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	SD3	Yes		No	Effective	Anglian Water supports the policy requirements for SuDS in principle. Whilst we recognise that the LLFA is a statutory consultee for major planning applications, we would seek drainage strategies to be submitted for all major and minor development to avoid any cumulative impacts on surface water flood risk, particularly where smaller developments may seek to connect to the public sewerage network. This would be consistent with clause 9 of Policy SD2, and recommendation 5-13 in the SFRA Level 1. Our Surface Water Risk Management Guidance provides comprehensive approach to how we will assess different types of site in terms of surface water connections. https://www.anglianwater.co.uk/siteassets/developers/development-services/aws-surface-water-guide-sm.pdf For new surface water connections to an existing surface water sewer Anglian Water will need to ensure the surface water hierarchy has been followed and require developers to liaise with the Lead Local Flood Authority (LLFA) - this is an essential pre-requisite to Anglian Water accepting a surface water drainage strategy. If LLFA are satisfied that, based upon evidence, no other option is feasible then a connection point may be made to the surface water sewer at a rate agreed	We would recommend a policy modification to ensure that drainage strategies will be submitted for all major and minor development to avoid any cumulative impacts on surface water flood risk, particularly where smaller developments may seek to connect to the public sewerage network. Anglian Water would seek to ensure that our surface water guidance is reference	No	Not Answered		A	Anglian Water supports the policy requirements for SuDS in principle. Whilst we recognise that the LLFA is a statutory consultee for major planning applications, we would seek drainage strategies to be submitted for all major and minor development to avoid any cumulative impacts on surface water flood risk, particularly where smaller developments may seek to connect to the public sewerage network.	Modification to policy SD3 2. All ~~major~~ qualifying development, will be required to submit a drainage strategy to demonstrate that the surface water hierarchy has been followed, how both on and off-site flood risk will be managed and how mitigation measures ~~should~~ will be satisfactorily integrated into the design and layout of the development. <u>New paragraph 21:35</u> Qualifying development is major development (as defined in the GPDO) and minor development which seeks to connect to the public sewerage network. <u>Consistency with SFRA recommendation 5.13</u> Part 1 of Policy SD3 requires all development to reduce surface water run-off which is considered to reflect the SFRA recommendation.	Y - Modification to policy SD3 2. All ~~major~~ qualifying development, will be required to submit a drainage strategy to demonstrate that the surface water hierarchy has been followed, how both on and off-site flood risk will be managed and how mitigation measures ~~should~~ will be satisfactorily integrated into the design and layout of the development. <u>New paragraph 21:35</u> Qualifying development is major development (as defined in

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											with LLFA, subject to there being existing capacity or the provision of network reinforcement to accommodate the flow. The developer is responsible for providing the appropriate surface water disposal infrastructure. As such, all the work to determine the feasibility of a connection to the existing surface water sewer complete with all upgrades to the consented outfall is to be carried out by the developer at their cost. Anglian Water will request a planning condition to ensure no additional flow will be connected until, any identified upgrades have been delivered and sufficient capacity in the network has been demonstrated. Should network reinforcement be required because of additional surface water flow to an existing public surface water sewer, Anglian Water will request a planning condition to ensure no additional flow will be connected until sufficient capacity in the network has been demonstrated. Reinforcement of the existing network, when required as a consequence of a new surface water connection, is not included within the Infrastructure Charge. These works may be requisitioned under Section 98 of the Water Industry Act 1991 or implemented by a self-lay provider under Section 151 of the Water Industry Act 1991, with the capital cost fully	d in the supporting text, so that developers/applicants are aware of the approach we use when considering surface water drainage for new development.					This would be consistent with clause 9 of Policy SD2, and recommendation 5-13 in the SFRA Level 1. For new surface water connections to an existing surface water sewer Anglian Water will need to ensure the surface water hierarchy has been followed and require developers to liaise with the Lead Local Flood Authority (LLFA) - this is an essential pre-requisite to Anglian Water		the GPDO) and minor development which seeks to connect to the public sewerage network. <u>Consistency with SFRA recommendation 5.13</u> Part 1 of Policy SD3 requires all development to reduce surface water run-off which is considered to reflect the SFRA recommendation.

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											chargeable to the applicant. A cost and time-scale estimate can be provided for requisitioned network reinforcement. Anglian Water would seek to ensure that our surface water guidance is referenced in the supporting text, so that developers/applicants are aware of the approach we use when considering surface water drainage for new development. We agree that no developments should connect surface water discharge to the foul network. Our surface water networks are designed for the existing catchment; therefore it is assumed to have minimal residual capacity for additional flow. Once approval in principle has been reached with LLFA, detailed analysis can be undertaken to establish the receiving surface water network capacity. Detailed analysis will be required to establish whether there is existing capacity to accommodate the proposed connection and if not, to advise on the extent of network reinforcement required. The developer is responsible for providing the appropriate surface water disposal infrastructure. As such, all the work to determine the feasibility of a connection to the existing surface water sewer complete with all upgrades to the consented outfall is to be carried out by the developer at their cost. Anglian Water 21.37 Anglian Water supports						accepting a surface water drainage strategy. If LLFA are satisfied that, based upon evidence, no other option is feasible then a connection point may be made to the surface water sewer at a rate agreed with LLFA, subject to there being existing capacity or the provision of network reinforcement to accommodate the flow. Anglian Water will request a planning condition to ensure no		

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											the link between SuDS and water efficiency measures through rainwater harvesting and reuse. Anglian Water works with a wide range of partners through the Ofwat Innovation Fund project - Enabling Water Smart Communities, which provides useful information on opportunities for integrated water management including water reuse in new developments.						additional flow will be connected until, any identified upgrades have been delivered and sufficient capacity in the network has been demonstrated. Should network reinforcement be required because of additional surface water flow to an existing public surface water sewer, Anglian Water will request a planning condition to ensure no additional flow will be connected until sufficient		

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																	capacity in the network has been demonstrated. Reinforcement of the existing network, when required as a consequence of a new surface water connection, is not included within the Infrastructure Charge. These works may be requisitioned under Section 98 of the Water Industry Act 1991 or implemented by a self-lay provider under Section 151 of the Water Industry Act 1991,		

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																	with the capital cost fully chargeable to the applicant. A cost and time-scale estimate can be provided for requisitioned network reinforcement. Anglian Water would seek to ensure that our surface water guidance is referenced in the supporting text, so that developers/applicants are aware of the approach we use when considering surface water drainage for new developm		

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																	ent. We agree that no developments should connect surface water discharge to the foul network. Our surface water networks are designed for the existing catchment; therefore it is assumed to have minimal residual capacity for additional flow. Once approval in principle has been reached with LLFA, detailed analysis can be undertaken to establish the receiving		

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																	surface water network capacity. Detailed analysis will be required to establish whether there is existing capacity to accommodate the proposed connection and if not, to advise on the extent of network reinforcement required. The developer is responsible for providing the appropriate surface water disposal infrastructure. As such, all the work to determine the feasibility		

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																	of a connection to the existing surface water sewer complete with all upgrades to the consented outfall is to be carried out by the developer at their cost. Anglian Water. Anglian Water supports the link between SuDS and water efficiency measures through rainwater harvesting and reuse. Anglian Water works with a wide range of partners through the Ofwat Innovation Fund project -		

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																	Enabling Water Smart Communities, which provides useful information on opportunities for integrated water management including water reuse in new developments.		
1013 - 0012	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	SD6	Yes		Yes		Anglian Water supports the policy to manage and reduce pollution, particularly through water efficient design and the installation of SuDS and delivery of multi-functional green infrastructure. We welcome clause 2 which includes reference to new development being affected by an adverse effect on the environment. We deduce from this statement, that this includes introducing an 'agent of change' to an area, something which is also alluded to in clause 3 regarding impacts on existing businesses and community facilities. NOTE: Anglian Water would		No	Not Answered		A	Anglian Water supports the policy to manage and reduce pollution, particularly through water efficient design and the installation of SuDS and delivery of multi-	<u>Modification: New paragraph</u> 21.56 Development proposals should be mindful of proximity to wastewater infrastructure facilities such as pumping stations and water recycling centres due to the presence of sensitive receptors and potential loss of amenity due to odour and/or noise arising from the operation of	<u>Y- Modification : New paragraph</u> 21.56 Development proposals should be mindful of proximity to wastewater infrastructure facilities such as pumping stations and water recycling

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											suggest the supporting text could include specific reference to wastewater infrastructure facilities such as pumping stations and our water recycling centres where we seek to recommend new development (particularly residential development) avoids encroachment on our assets due to the proximity of sensitive receptors and potential loss of amenity due to odour and/or noise arising from the operation of our essential infrastructure.						functional green infrastructure. We welcome clause 2 which includes reference to new development being affected by an adverse effect on the environment. We deduce from this statement, that this includes introducing an 'agent of change' to an area, something which is also alluded to in clause 3 regarding impacts on existing businesses and community facilities. NOTE: Anglian	essential infrastructure.	centres due to the presence of sensitive receptors and potential loss of amenity due to odour and/or noise arising from the operation of essential infrastructure.

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																	Water would suggest the supporting text could include specific reference to wastewater infrastructure facilities such as pumping stations and our water recycling centres where we seek to recommend new development (particularly residential development) avoids encroachment on our assets due to the proximity of sensitive receptors and potential loss of		

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																	amenity due to odour and/or noise arising from the operation of our essential infrastructure.		
1013 - 0013	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	SD9	Yes		Yes		Anglian Water strongly supports the policy requirements. In addition to the publications referenced in the supporting text, the tighter water efficiency standard of 90 litres per person per day (l/p/d) aligns with the Shared Standards for Water Efficiency in Local Plans, which was published in June 2025. These Shared Standards set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It recommends that Local Planning Authorities (LPAs) include tighter water efficiency standards in Local Plan policies to support a clean and sustainable supply of water - essential for growth and nature recovery. https://www.anglianwater.co.uk/siteassets/developers/new-content/p--c/shared-standards-in-water-efficiency-for-local-plans.pdf		No	Not Answered		A	Anglian Water strongly supports the policy requirements. In addition to the publications referenced in the supporting text, the tighter water efficiency standard of 90 litres per person per day (l/p/d) aligns with the Shared Standards for Water Efficiency in Local Plans, which was published in June	Modifications agreed as set out in Schedul of Modifications and the Statements of Common Ground of the Water Copanies and Essex CC.	Y - Modifications agreed as set out in Schedul of Modifications and the Statements of Common Ground of the Water Copanies and Essex CC.

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											The Shared Standards recommend that LPAs include Local Plan Policies that: Require new homes to be built to more stringent standards for water efficiency than the optional Building Regulations (part G) standard of 110 litres per person per day (l/p/d). Evidence indicates that a design standard of up to 85 litres/person/day (l/p/d) for residential developments is feasible (suggests a range between 85-95 l/p/d subject to viability and feasibility). Require new, extended or redeveloped non-domestic development to aim to achieve full credits in the BREEAM water calculator. Require new major non-domestic developments to include water saving measures and water reuse in their design. These standards provide guidance and local evidence to help LPAs make a case that more stringent water efficiency policies are justified, feasible and viable as part of Water Cycle Studies and Integrated Water Management Plans that effectively manage a range of challenges across the water environment and aid nature recovery. Local Plans have a significant role in helping to deliver the sustainable use of water resources and address shorter-term water scarcity issues. LPAs can help ensure the risk of harm to habitats and							2025. Reference to shared standards amd BREEM.		

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											deterioration to water bodies due to water scarcity is minimised by setting more ambitious, tighter water efficiency standards for new residential and non-domestic developments in local planning policy. Whilst Anglian Water is not the statutory water undertaker for Castle Point, tighter water efficiency standards mean lower flows of wastewater that consequently result in less operational carbon being expended in pumping flows through our networks and treatment at our WRCs. As a partner to the Shared Standards, we endorse the requirement for 90 l/p/d for new residential development and for all new non-household (commercial development) to meet the full credits in BREEAM's WAT 01 calculator. In terms of wastewater and policy clause 4 - we endorse this policy approach for wastewater infrastructure which aligns with similar policies in other Local Plans across our region. Anglian Water advises developers to seek early engagement on their proposals for wastewater connections. For example, we may require a sustainable point of connection to our network, particularly where a site may trigger a number of risks - such as pollution risks and CSO spills, surcharges of our network, existing flood potential and excess surface water flooding.								

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											We welcome the supporting text set out in paragraphs 21.72 - 21.76 which clearly define our role and investment in sewerage infrastructure.								
1013 - 0014	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	Policies Map	Yes		No	Justified	Our landownership for Canvey Island WRC extends further than shown on the Policies Map, which currently shows our WRC excluded from the designations. However, our landownership for the site includes part of the access to our site and a strip of land that contains the final effluent pipe extending from the south of the WRC to the coastline.	Anglian Water requests that the Policies Map excludes the entirety of our WRC operational land from the land indicated as 'Green Lung' and Park	No	Not Answered		A	Anglian Water landownership for Canvey Island WRC extends further than shown on the Policies Map, which currently shows our WRC	Modification: Policies Map to be modified in accordance with Anglian Water operational land/land ownership mapping, as illustrated on the Schedule of Mods and the Anglian Water Statement of Common Ground.	Y Modification : Policies Map to be modified in accordance with Anglian Water operational land/land ownership mapping, as illustrated on the Schedule of Mods and the Anglian Water

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												Homes to ensure that any operational or engineering works required in relation to maintaining or improving essential wastewater infrastructure is not constrained by the designation of the 'Green Lung'. Anglian Water can provide the Council with details of our operational land/land ownership for this site to assist with accuracy of the Policies Map and the attributed land					excluded from the designations. However, our landownership for the site includes part of the access to our site and a strip of land that contains the final effluent pipe extending from the south of the WRC to the coastline.		Statement of Common Ground.

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												designations.							
1045 - 0001	Individual	Russell	Savage		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant ,	Support noted.	N
1046 - 0001	Individual	Clair	Savage		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant ,	Support noted.	N
1047 - 0001	Individual	Thomas	Savage		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant ,	Support noted.	N
0337 - 0001	Organisation	Alex	Savine	Thurrock Council		SP3	Not Stated	Thurrock recognises the heavily constrained planning context that Castle Point Council contends with, being only 17 square miles in area and covered with numerous environmental designations including			At this stage we wish to reiterate that we are currently unable to confirm whether Thurrock Council can assist with meeting unmet housing need in Castle Point. As part of our work on the new Thurrock Local Plan 2024-2044, we are undertaking a review of our own Green Belt and Grey Belt areas within the Borough. In addition, we are mid-way through our own site assessment process to determine whether Thurrock has sufficient housing and employment land to meet its own needs. This process is anticipated to be complete early in 2026, and we welcome further discussion with Castle Point at that stage.					A	TC is currently working on its new Thurrock Local Plan 2024 – 2044 and is reviewing its Green Belt and Grey Belt areas as well as assessing sites to ascertain whether it can meet its own housing needs.	TC agrees that Castle Point faces notable physical and environment constraints to growth and TC has no objections to CPBC's approach to addressing housing need. Both CPBC and TC agree to continue to work collaboratively through SEC to address CPBC and other authority areas' unmet housing need within South Essex, while recognising the significant constraints that each of these	N

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								Ramsar Sites, Special Protection Areas, Sites of Special Scientific Interest, Ancient Woodland and Flood Risk Zone 3b. The combined constraints map shows that around 1,824ha of the Borough's Green Belt is constrained by footnote 7 constraints or is otherwise constrained by nature conservation constraints or open space constraints . No sites within the Green Belt have been identified as potential site allocations									Consequently, at this moment TC is unable to confirm whether it can assist CPBC in meeting its unmet housing need.	authority areas face in meeting that need	

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								within the Draft Local Plan, and as a result only 53% of the Standard Method figure of 11,662 homes has been met through the proposed allocations , comprising existing commitments, urban allocations and windfall sites. Thurrock Council do not wish to object to the Council's approach to addressing housing need within the Borough. We note that a design-based capacity assessment has been undertake											

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								n by Place Services to maximise density on the urban sites proposed for allocation within the Draft Plan.											
0337 - 0002	Organisation	Alex	Savine	Thurrock Council		C5	Yes	During consultation on the Regulation 18 Castle Point Local Plan, Thurrock Council previously raised an objection to Castle Point's proposal for a Canvey Island (Northwick Road) to Thurrock (A1014 Manorway) road link on grounds of impact on landscape, SSSI, SPAs and highways. Concerns centred on the impact on local communiti	Yes								TC notes that CPBC intends to prepare a feasibility study (Policy C5) to explore options and welcomes further discussion to provide for better access to and from Canvey Island	CPBC and TC agree to collaborate on the feasibility work to explore the options for better access to and from Canvey Island.	N

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								es along the Manorway and the junction of Manorway with A13. At the time of the Regulation 18 consultation, no evidence was provided to justify the scheme in terms of highway modelling, programming, funding, phasing or delivery, nor was there an environmental appraisal of the proposal. We note that the Regulation 19 Draft Local Plan has not included this scheme. Instead, Policy C5 commits the Council to											

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								undertaking a feasibility study to identify options for improving access to, from and within Canvey Island, including its wider strategic implications. The policy wording clarifies it will be developed in collaboration with ECC and adjoining authorities among others and will undergo Habitat Regulations Assessment. Thurrock Council welcomes this approach and is willing to engage in future discussion											

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								s on this matter.											
0337 - 0003	Organisation	Alex	Savine	Thurrock Council		SD4	Yes	Thurrock Council welcomes the inclusion of Policy SD4 (Net Zero Carbon in Operation) requiring new development within the borough to be ultra-low energy buildings, fossil fuel free, and generate renewable energy on-site to at least match annual energy use.	Yes								TC supports the Net Zero Carbon Development policies SD4 In operation and SD5 Embodied Carbon as policies that represent a substantial step in addressing climate change across South Essex and providing certainty and clarity to developers.	CPBC and TC agree that it is appropriate to pursue a Climate Responsive Design approach in their respective local plans, while acknowledging that detailed policy in the Thurrock Local Plan will be subject to confirmation of evidence and testing.	N
0337 - 0004	Organisation	Alex	Savine	Thurrock Council		SD5	Yes	Similarly, the inclusion of Policy SD5 (Embodied Carbon) follows, requiring Whole Life	Yes								TC supports the Net Zero Carbon Development policies SD4 In operation	CPBC and TC agree that it is appropriate to pursue a Climate Responsive Design approach in their respective local plans, while acknowledging that detailed policy in the Thurrock Local Plan	N

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								Cycle Carbon Assessments. These policies are considered to be a substantial positive step in addressing climate change which requires all authorities to act. Progressing with a similar policy stance across Greater Essex will ensure a coordinated approach by Local Planning Authorities to this cross-boundary issue and provides clarity and certainty for the development industry on energy standards and planning									and SD5 Embodied Carbon as policies that represent a substantial step in addressing climate change across South Essex and providing certainty and clarity to developers.	will be subject to confirmation of evidence and testing.	

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								application submission requirements.											
0337 - 0005	Organisation	Alex	Savine	Thurrock Council		ENV4	Yes	Similarly, Thurrock Council endorses the inclusion of direct reference to the Essex Local Nature Recovery Strategy within Policy ENV4 (Local Wildlife and Geological Sites) requiring development proposals to be designed to enable and support the habitat priority measures identified within the Strategic Opportunities, and to ensure areas that are	Yes								TC supports Policy ENV4 and the direct reference to the Local Nature Recovery Strategy requiring development proposals to have regard for and protect strategically important areas of biodiversity.	CPBC and TC agree to enable and support biodiversity opportunities through their local plans.	N

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								identified as an Area of Particular Importance for Biodiversity (APIBs) are protected. Given the novel nature of the LNRS's the wording of this policy takes a proportionate approach that seeks to improve biodiversity without limiting development proposals from coming forward.											

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0220 - 0001	Individual	Steve	Sawkins		Yes	SP3	Yes	1.01 Canvey Island is the most Densely Populated and Deprived part of Castle Point. Despite its social challenges and constrained infrastructure, it hosts 2 Top Tier COMAH sites, in very close proximity to the Residential neighbourhoods. These sites pose risks of catastrophic incidents due to mechanical failure, human error, or external threats. Increasing residential density near such installation	No	Positively Prepared, Effective, Justified, Consistent with National Policy	Summary Statement This representation is submitted in response to the Regulation 19 consultation on the Castle Point Borough Council Local Plan 2026–2043. It is our view that the Plan fails all four tests of soundness as defined in the National Planning Policy Framework (NPPF). The Plan is underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. 1. Is the Plan Positively Prepared? The Plan is not positively prepared to meet the area’s objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. The Plan selectively identifies flood risk constraints (Footnote 7) and then actively proposes development in those high-risk areas. The NPPF 2024 explicitly removes the ability for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints		Yes	To introduce and explain any extra specific supporting evidence in relation to the matters raised in this submission during the Examination in Public (EiP) process		C	Does not meet the area’s objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The Plan lacks proportionate evidence and fails to consider reasonable alternatives The Plan is not effective or	Noted	N

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								s elevates the potential consequences of a major incident. The COMAH regulations and associated Hazard Ranges are designed to limit exposure—not expand it. The juxtaposition of high-density housing with high-risk industrial infrastructure is antithetical to sustainable land-use planning. 1.02 Canvey Island is at, or just below Sea Level apart from a small area known as Canvey Heights. It is designated a Flood			on Canvey Island, it paradoxically allocates significant housing development to West Canvey. Conclusion: The Plan does not seek to meet development needs in a sustainable or safe manner. 2. Is the Plan Justified ? The Plan lacks proportionate evidence and fails to consider reasonable alternatives. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequencebased analysis for vulnerable populations. Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-prone areas, without demonstrating that safer alternatives were adequately considered. It fails to identify Canvey Island as a single flood cell requiring open space catchment areas for flood mitigation . Whilst the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey, despite failing to provide the required Level II SFRA Conclusion: The Plan is not based on proportionate evidence and fails to justify its						deliverable given the known constraints. Major allocations such as West Canvey Island and the Seaview Road corridor lie within flood zones and lack infrastructure to support emergency planning. Pressures on roads and healthcare are acknowledged but not resolved through binding delivery mechanisms. The Plan fails to meet the housing targets set by the Standard Methodology		

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								Zone 3A area. Whilst it has Sea Defences, it remains at Residual and Actual Risk of Tidal Flooding, a substantial planning issue. With the rising sea level, due to climate change, the protection afforded by these existing defences is decreasing, and is likely to fall below current target levels within the lifetime of any new developments. 1.03 Indicative flood defence raising requirements are as			spatial strategy. 3. Is the Plan Effective ? The Plan is not effective or deliverable given the known constraints. Major allocations such as West Canvey Island and the Seaview Road corridor lie within flood zones and lack infrastructure to support emergency planning. Pressures on roads and healthcare are acknowledged but not resolved through binding delivery mechanisms. The primary housing site is not shovel-ready and faces significant delivery time constraints, undermining the Plan's ability to meet urgent housing needs. Conclusion: The Plan is not deliverable without significant risk to public safety and infrastructure capacity. 4. Consistent with National Policy ? The Plan fails to meet the housing targets set by the Standard Methodology and does not integrate consequence-based planning for flood risk or hazardous installations. This is contrary to NPPF guidance and Planning Practise Guidance on safe development and resilience. Furthermore, the Plan does not reflect legal duties under the Civil Contingencies Act 2004 or COMAH Regulations to plan for foreseeable emergencies. Conclusion: The Plan is inconsistent with national policy and statutory obligations for								

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								follows: • About 0.3m in 2040 (to a level of 6.7m AOD) • A further 1.4m in 2070 (to a level of 8.1m AOD) These increases depend on the rate of sea level rise. 1 1.04 These aspirational new raised sea defences may actually harm the sustainability of Canvey Island as a desirable location to live. “Whilst hard defences could potentially be raised within existing footprints, the structures would be tall, unattractiv			riskinformed development. In light of the above, we respectfully request that the Castle Point Local Plan 2026–2043 be withdrawn or substantially revised to address the issues raised in this representation. The Plan must be re-evaluated to ensure it meets the tests of soundness, prioritises public safety, and complies with national policy and legal obligation. Is the Plan Legal ? On the basis that this plan has been constructed by professional planners, we could not consider ourselves qualified to challenge its legality, subsequently we are compelled to respond "YES" to this question. However, this submission sets out to indicate that CPBC draft Reg19 consultation may well prove to be unsound or even illegal, being neither positively prepared nor adequately evidenced. The advice provided at 1.09 and 1.10 of this submission, has not been made lightly and goes some way to support our argument that adopting a wholly no Green Belt development policy, at the expense of public safety is somewhat perverse. Prioritising mainland Green Belt protection without fully accounting for major incident hazard range and the potential for catastrophic flood events on Canvey Island, effectively subdividing the borough’s								

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								e and restrict public access.” 2 1.05 Castle Point Borough Council, within Planning Matters suggest, as a general approach that “the continued development of Canvey Island is necessary to sustain the local community and prevent the social and economic blight of the settlement”. 3 1.06 However, this claim overlooks the NPPF requirement to avoid new housing in highconsequence flood zones unless			communities, may make the draft CPBC Plan be deemed not only unreasonable but also unprincipled and corporately illogical.								

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								there are no reasonably available lower-risk sites. Being such a small Borough, it is difficult to suggest that there are no more suitable sites in the near vicinity in lower Flood Risk Zones. 1.07 To claim that housing development improves “sustainability” in this context ignores the fundamental principle of avoiding development in high-consequence flood zones, as emphasised in the NPPF and Strategic Flood Risk Assessments. 1.08 True											

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								sustainability involves balancing environmental constraints, social well-being, and economic viability. Adding residential housing in a location with constrained evacuation routes, ageing infrastructure, and limited resilience planning, does not meet this balance. This does not comply with the NPPF's Sequential Approach to Strategic Development Site Selection. 1.09 We are mindful of Castle Point Borough Council											

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								own officers advice to Councillors; "Given the risk to the population, various measures are required to deal with the concerns to human health and wellbeing. These include: • The need for an emergency plan to be in place; • The need for sea defences to be maintained and improved; • The need to maintain the population living in the flood risk zone at current levels or lower;" (My emphasis)											

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								1.10 Also, Advice to CPBC, contained in the current Strategic Flood Risk Assessment Level1 "Recommendation 4-2 CPBC should pursue opportunities to move existing development from within the floodplain to areas with a lower risk of flooding." (My emphasis) 1.11 To propose a Mixed Use Development at West Canvey will necessitate the use of Green Land, an area which, alongside other green areas, fulfilled an											

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								essential flood prevention purpose for nearby land during the Canvey Island 2014 Summer Flooding. Plus it will increase the Population at Risk of Flooding and a Hazardous Industry incident. 1.12 Essex County Council produced a 41 page Flood Investigation Report, into the “Canvey Island 2014 Summer Flood.” 5 This document was highly informative of the devastation caused and the shortcomings and failures of the various											

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								infrastructure and agencies, during the event. 1.13 Following this the “Canvey Island 6-Point Plan” 6 was produced to attempt to raise Government assistance in Funding. “The cost of a future flooding incident on the Island would be in the region of £274m per year in lost economic output, and up to £2.1bn in damage to residential property.” “Unless a strategic and wide reaching flood mitigation programme can be implemented, site											

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								based flood mitigation could be seen by developers as too expensive and fragmented.”” In order to deliver this vital plan, all relevant agencies and central government need to work together and address the £24.5m funding shortfall.” 1.14 The approach to Government found that a detailed account of funding expenditure was required to proceed to consideration, and we are led to believe that is where the											

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								effort was left. 1.15 Initially, following the 2013 and 2014 Canvey Flooding, work was undertaken on the mapping of the Canvey Integrated Urban Drainage System, Drainage repairs, and Road drainage infrastructure maintenance undertaken. Unfortunately the regularity of these services receive inadequate finances, and rather than the promised more regular maintenance, they now receive less. 1.16 We											

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								are now informed that the Urban Greening Scenario Testing on Canvey Island would not produce a significant impact on Flood Risk. 7 1.17 We are also mindful of the Examining Inspector's Letter of Advice to Castle Point Council, during the very first attempt to produce a CPBC Plan; "I have reservations about the methodology employed and the way in which it appears to have been used, leading to inconsistent and											

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								inappropriate site selection. For example, the Council's own Sustainability Appraisal is unclear as to why the most sustainable Green Belt site was discounted. I therefore consider the Council needs to revisit its assessment of Green Belt locations paying particular regard to the five purposes of the Green Belt as set out in PPG2. I accept that other considerations will also influence the choice											

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								of sites but potential locations should not be dismissed because local factors are given too much weight. This appears to have happened previously. The Council's desire to protect its Green Belt areas is understandable but its approach has also had a considerable bearing on the overall distribution of growth promoted in the Core Strategy. In this respect, I consider it would be difficult to endorse a strategy which commits											

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								to Green Belt release in an area of potential high flood risk at Canvey Island yet fails to identify more than a token amount of land on the mainland where flooding is not a significant issue. While I accept some development at Canvey Island may be required to meet local needs and to support services, I am not convinced that maintaining the current distribution of development across the Borough is justified											

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								given the existing constraints .” 8 1.18 Rather than developing more housing at a rate that will inevitably increase the numbers of population of Canvey Island at Risk of Flooding and / or a Hazardous Industrial Incident, caution should be applied and Development should be planned-for in a limited fashion by means of Regeneration. Thus providing work for the local Building Industry. 1.19 In these											

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								circumstances there is no place for the “Local Factors” previously recognised by Planning Inspector Mr P.Crysell, see above, to remain an influence on the skewed Housing Development Distribution contained within this latest version of the CPBC Plan. 1.20 Whilst this approach may be considered radical, we consider it essential that the Population level of Canvey Island be maintained at the same level, or											

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								lower, and that the Constraints indicated within the NPPF are justly applied for the benefits of the Health, Safety and Well-being of all Canvey Islanders. The Regeneration of Brownfield land should be the approach to enable Sustainable Development for Canvey Island.											

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0220 - 0002	Individual	Steve	Sawkins		Yes	SD1		CPBC Plan Page 170 6.01 In the further interest of public safety, there needs to be a realisation that Canvey Island is at risk of being inundated by the sea. Subsequently there needs to be a “Flood Risk Consequence Analysis” undertaken that evaluates the consequences, on the population living and working at or below sea level, following a major breach, or over-topping of its Sea Defences. 6.02 Policy	No	Positively Prepared, Effective, Justified, Consistent with National Policy	Summary Statement This representation is submitted in response to the Regulation 19 consultation on the Castle Point Borough Council Local Plan 2026–2043. It is our view that the Plan fails all four tests of soundness as defined in the National Planning Policy Framework (NPPF). The Plan is underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. 1. Is the Plan Positively Prepared ? The Plan is not positively prepared to meet the area’s objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. The Plan selectively identifies flood risk constraints (Footnote 7) and then actively proposes development in those high-risk areas. The NPPF 2024 explicitly removes the ability for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints		Yes	To introduce and explain any extra specific supporting evidence in relation to the matters raised in this submission during the Examination in Public (EiP) process		C	The Plan selectively identifies flood risk constraints (Footnote 7) and then actively proposes development in those high-risk areas. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequence based analysis for vulnerable populations. 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) '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 Assessment (SFRA) and recommendations/advise from statutory bodies	

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								SD1 rightly identifies Canvey Island as being at high risk of tidal flooding and sets out principles to avoid development in Flood Zone 3. However, Policy C4 proposes considerable development in West Canvey, which lies within this zone. This contradiction undermines the credibility of the Plan and raises concerns about the safety and sustainability of future development			on Canvey Island, it paradoxically allocates significant housing development to West Canvey. Conclusion: The Plan does not seek to meet development needs in a sustainable or safe manner. 2. Is the Plan Justified ? The Plan lacks proportionate evidence and fails to consider reasonable alternatives. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequencebased analysis for vulnerable populations. Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-prone areas, without demonstrating that safer alternatives were adequately considered. It fails to identify Canvey Island as a single flood cell requiring open space catchment areas for flood mitigation . Whilst the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey, despite failing to provide the required Level II SFRA Conclusion: The Plan is not based on proportionate evidence and fails to justify its													(including EA, Essex LLFA).'

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								to wrongly report / imply that the funding for Canvey Island’s Sea defence improvements has been secured. The Environment Agency via, its TE2100 plan, aspires to maintain and improve the present level of protection, in respect of rise in sea levels consistent with global warming predictions. However, the Environment Agency strongly emphasises that such improvements are subjected			spatial strategy. 3. Is the Plan Effective ? The Plan is not effective or deliverable given the known constraints. Major allocations such as West Canvey Island and the Seaview Road corridor lie within flood zones and lack infrastructure to support emergency planning. Pressures on roads and healthcare are acknowledged but not resolved through binding delivery mechanisms. The primary housing site is not shovel-ready and faces significant delivery time constraints, undermining the Plan’s ability to meet urgent housing needs. Conclusion: The Plan is not deliverable without significant risk to public safety and infrastructure capacity. 4. Consistent with National Policy ? The Plan fails to meet the housing targets set by the Standard Methodology and does not integrate consequence-based planning for flood risk or hazardous installations. This is contrary to NPPF guidance and Planning Practise Guidance on safe development and resilience. Furthermore, the Plan does not reflect legal duties under the Civil Contingencies Act 2004 or COMAH Regulations to plan for foreseeable emergencies. Conclusion: The Plan is inconsistent with national policy and statutory obligations for								

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								to funding and costeffectiveness. Without such improvements Canvey Island may become unsustainable as a settlement . 6.04 There has been extensive works undertaken via Strategic Flood Risk Assessments giving timescale, velocity and depths of sea inundation at several locations across Canvey Island. However, such works have failed to provide any indication as to the type and number of the population			riskinformed development. In light of the above, we respectfully request that the Castle Point Local Plan 2026–2043 be withdrawn or substantially revised to address the issues raised in this representation. The Plan must be re-evaluated to ensure it meets the tests of soundness, prioritises public safety, and complies with national policy and legal obligation. Is the Plan Legal ? On the basis that this plan has been constructed by professional planners, we could not consider ourselves qualified to challenge its legality, subsequently we are compelled to respond "YES" to this question. However, this submission sets out to indicate that CPBC draft Reg19 consultation may well prove to be unsound or even illegal, being neither positively prepared nor adequately evidenced. The advice provided at 1.09 and 1.10 of this submission, has not been made lightly and goes some way to support our argument that adopting a wholly no Green Belt development policy, at the expense of public safety is somewhat perverse. Prioritising mainland Green Belt protection without fully accounting for major incident hazard range and the potential for catastrophic flood events on Canvey Island, effectively subdividing the borough's								

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								that would be engulfed within these inundation events. 6.05 With this in mind, we remain concerned by the methodology employed by Castle Point Borough Council in their application of the Sequential Test regarding development on Canvey Island. The Urban development only policy, effectively removes extensive option for sequentially testing alternative sites at other areas of the borough. 6.06 Given			communities, may make the draft CPBC Plan be deemed not only unreasonable but also unprincipled and corporately illogical.								

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								the extremely problematic logistical access and egress issues when planning for a breach of defended locations on Canvey Island, 14 it is imperative that where it may be intended to increase the numbers at risk or consequences of inundation , that site selection is informed by the findings of a "Major Breach of Sea Defence Consequence Analysis" 6.07 The overlapping of survey maps, imaging the landscape											

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								of the borough likely to be encompassed by such potential incidents, will provide a reasonable indication of the likely make up and numbers of the population and the severity of injuries 15 In doing so assisting CPBC with the undertaking of the duties placed upon them via the Civil Contingency Act. 6.08 Regarding Canvey Island's Green Belt and Green Field spaces, we consider these areas valuable											

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								and essential assets when considering Flood Risk, whether from Tidal or Surface Water sources. Their ability to provide Space for Water, and in the event of a Tidal Breach to											

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0220 - 0003	Individual	Steve	Sawkins		Yes	C4		3.01 The land to the south of Northwick Road has extant consent for employment development but this has been in place for many years due to a technical commencement but has not yet occurred. It appears that CPBC are confident that Housing development may be more forthcoming. This could be seen as being overly optimistic. A Housing development in close proximity to the proposed mixed industrial	No	Positively Prepared, Effective, Justified, Consistent with National Policy	Summary Statement This representation is submitted in response to the Regulation 19 consultation on the Castle Point Borough Council Local Plan 2026–2043. It is our view that the Plan fails all four tests of soundness as defined in the National Planning Policy Framework (NPPF). The Plan is underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. 1. Is the Plan Positively Prepared? The Plan is not positively prepared to meet the area’s objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. The Plan selectively identifies flood risk constraints (Footnote 7) and then actively proposes development in those high-risk areas. The NPPF 2024 explicitly removes the ability for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints		Yes	To introduce and explain any extra specific supporting evidence in relation to the matters raised in this submission during the Examination in Public (EiP) process		C	Underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. The NPPF 2024 explicitly removes the ability for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraint	Canvey Transport and 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	N

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								use development may offer little appeal, or confidence, to a potential new community of flat dwellers / home owners. 3.02 West Canvey is subject to the issues of potential Flood Risk, also the issues emanating from the Hazardous Industries which could potentially affect the rest of Canvey Island and its residents. 3.03 Being close to the sea defence the ground conditions may likely be affected by the high water table,			on Canvey Island, it paradoxically allocates significant housing development to West Canvey. Conclusion: The Plan does not seek to meet development needs in a sustainable or safe manner. 2. Is the Plan Justified ? The Plan lacks proportionate evidence and fails to consider reasonable alternatives. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequencebased analysis for vulnerable populations. Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-prone areas, without demonstrating that safer alternatives were adequately considered. It fails to identify Canvey Island as a single flood cell requiring open space catchment areas for flood mitigation . Whilst the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey, despite failing to provide the required Level II SFRA Conclusion: The Plan is not based on proportionate evidence and fails to justify its						s on Canvey Island, it paradoxically allocates significant housing development to West Canvey. The Plan does not seek to meet development needs in a sustainable or safe manner. The primary housing site is not shovel-ready and faces significant delivery time constraints, undermining the Plan's ability to meet urgent housing needs. The Plan is not deliverable without significant		

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								which in itself may be influenced by saline water, indicating tidal water traversing beneath the sea defence could be a constraint on the construction of a Flatted development. Raising Ground Levels above the threat of Flooding may well impact upon nearby land and property. 3.04 Some of the existing commercial users in the Charfleets area are themselves involved in heavy industrial activities, creating an undesirabl			spatial strategy. 3. Is the Plan Effective ? The Plan is not effective or deliverable given the known constraints. Major allocations such as West Canvey Island and the Seaview Road corridor lie within flood zones and lack infrastructure to support emergency planning. Pressures on roads and healthcare are acknowledged but not resolved through binding delivery mechanisms. The primary housing site is not shovel-ready and faces significant delivery time constraints, undermining the Plan’s ability to meet urgent housing needs. Conclusion: The Plan is not deliverable without significant risk to public safety and infrastructure capacity. 4. Consistent with National Policy ? The Plan fails to meet the housing targets set by the Standard Methodology and does not integrate consequence-based planning for flood risk or hazardous installations. This is contrary to NPPF guidance and Planning Practise Guidance on safe development and resilience. Furthermore, the Plan does not reflect legal duties under the Civil Contingencies Act 2004 or COMAH Regulations to plan for foreseeable emergencies. Conclusion: The Plan is inconsistent with national policy and statutory obligations for							risk to public safety and infrastructure capacity Without significant infrastructure upgrades, environmental mitigation , and a shift in thesurrounding land uses, the site risks becoming an isolated, high-cost enclave rather than a thriving community.		

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								e area for a Housing development 3.05 The current new retail / commercial area, despite being popular amongst locals is extremely poorly served by public transport. It relies on a high majority of private car users. 3.06 Without significant infrastructure upgrades, environmental mitigation, and a shift in the surrounding land uses, the site risks becoming an isolated, high-cost enclave rather than a thriving			riskinformed development. In light of the above, we respectfully request that the Castle Point Local Plan 2026–2043 be withdrawn or substantially revised to address the issues raised in this representation. The Plan must be re-evaluated to ensure it meets the tests of soundness, prioritises public safety, and complies with national policy and legal obligation. Is the Plan Legal ? On the basis that this plan has been constructed by professional planners, we could not consider ourselves qualified to challenge its legality, subsequently we are compelled to respond "YES" to this question. However, this submission sets out to indicate that CPBC draft Reg19 consultation may well prove to be unsound or even illegal, being neither positively prepared nor adequately evidenced. The advice provided at 1.09 and 1.10 of this submission, has not been made lightly and goes some way to support our argument that adopting a wholly no Green Belt development policy, at the expense of public safety is somewhat perverse. Prioritising mainland Green Belt protection without fully accounting for major incident hazard range and the potential for catastrophic flood events on Canvey Island, effectively subdividing the borough's								

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								community. 3.07 A phased or mixed-use Masterplan that buffers residential areas from heavy industry, integrates green space, and improves transport could make the scheme more viable, however, that would require substantial investment and coordination			communities, may make the draft CPBC Plan be deemed not only unreasonable but also unprincipled and corporately illogical.								

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0220 - 0004	Individual	Steve	Sawkins		Yes	C3		CPBC Plan Pages 38 – 39 2.01 Insufficient Controls on Activities: There is no clear framework for monitoring or regulating port operations . Policies SD6 (Pollution Control), SD1 (Flood Risk), and SD8 (Hazardous Uses) should be explicitly referenced and integrated into Policy C3 to ensure proper oversight. 2.02 The Port Facility at Canvey Island specifically only facilitates the unloading for	No	Positively Prepared, Effective, Justified, Consistent with National Policy	Summary Statement This representation is submitted in response to the Regulation 19 consultation on the Castle Point Borough Council Local Plan 2026–2043. It is our view that the Plan fails all four tests of soundness as defined in the National Planning Policy Framework (NPPF). The Plan is underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. 1. Is the Plan Positively Prepared ? The Plan is not positively prepared to meet the area’s objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. The Plan selectively identifies flood risk constraints (Footnote 7) and then actively proposes development in those high-risk areas. The NPPF 2024 explicitly removes the ability for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints		Yes	To introduce and explain any extra specific supporting evidence in relation to the matters raised in this submission during the Examination in Public (EiP) process		C	Highlights risks at hazardous sites Hazardous installations 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 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	Hazardous installations 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 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	Policy House 5 – Park Homes. 1. New park homes will only be supported on existing Park Home sites as defined on the Policies Map, and subject to compliance with other plan policies Justification : The existing wording may be misinterpreted that intensification of Park Homes is automatically acceptable in principle. Noting that park home sites exist within areas of serious constraint such as the consultation zone for hazardous installations (Policy SD8), FZ3, etc.

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								storage, forwarding on and bunkering of huge quantities of hazardous materials, these being LPG, oil and fuel-based products, serving the Upper Tier Establishments (upper tier, being a recognition of specified quantities of certain dangerous substances processed or stored, having the potential to cause significant on-site and off-site consequence to employees, the wider members of the public, including the			on Canvey Island, it paradoxically allocates significant housing development to West Canvey. Conclusion: The Plan does not seek to meet development needs in a sustainable or safe manner. 2. Is the Plan Justified ? The Plan lacks proportionate evidence and fails to consider reasonable alternatives. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequencebased analysis for vulnerable populations. Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-prone areas, without demonstrating that safer alternatives were adequately considered. It fails to identify Canvey Island as a single flood cell requiring open space catchment areas for flood mitigation Whilst the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey, despite failing to provide the required Level II SFRA Conclusion: The Plan is not based on proportionate evidence and fails to justify its						alternatives were adequately considered. It fails to identify Canvey Island as a single flood cell requiring open space catchment areas for flood mitigation The Plan is not based on proportionate evidence and fails to justify its spatial strategy. Furthermore, the Plan does not reflect legal duties under the Civil Contingencies Act 2004 or COMAH Regulations to plan for foreseeable emergencies.	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 development is proposed' 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. 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	

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								possibility of causing multiple fatalities) of Calor Gas and Oikos. 2.03 The Plan fails to reference or take into account the proposed Oikos Marine & South Side Development (Case Ref: TR030004) , a live Nationally Significant Infrastructure Project (NSIP) currently in the pre-application phase. 9 Should this application be accepted the resulting outcome would effectively double the storage capacity provided by this			spatial strategy. 3. Is the Plan Effective ? The Plan is not effective or deliverable given the known constraints. Major allocations such as West Canvey Island and the Seaview Road corridor lie within flood zones and lack infrastructure to support emergency planning. Pressures on roads and healthcare are acknowledged but not resolved through binding delivery mechanisms. The primary housing site is not shovel-ready and faces significant delivery time constraints, undermining the Plan's ability to meet urgent housing needs. Conclusion: The Plan is not deliverable without significant risk to public safety and infrastructure capacity. 4. Consistent with National Policy ? The Plan fails to meet the housing targets set by the Standard Methodology and does not integrate consequence-based planning for flood risk or hazardous installations. This is contrary to NPPF guidance and Planning Practise Guidance on safe development and resilience. Furthermore, the Plan does not reflect legal duties under the Civil Contingencies Act 2004 or COMAH Regulations to plan for foreseeable emergencies. Conclusion: The Plan is inconsistent with national policy and statutory obligations for						The Plan does not integrate consequence-based planning for flood risk or hazardous installations. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP). The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/	hazardous installations. Where the HSE advises against development the planning application will be refused on health and safety grounds'. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP). The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/	

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								establishment. This omission undermines the Local Plan's compliance with the tests of soundness when set against Policy C4 increased societal risk. Calor Gas and Oikos Major Hazards Storage and Distribution Site 2.04 The Castle Point Plan Policy SD8 fails to address the significance of the hazardous sites of Calor Gas and Oikos by not employing the current HSE methodology, despite CPBC being the			risk informed development. In light of the above, we respectfully request that the Castle Point Local Plan 2026–2043 be withdrawn or substantially revised to address the issues raised in this representation. The Plan must be re-evaluated to ensure it meets the tests of soundness, prioritises public safety, and complies with national policy and legal obligation. Is the Plan Legal ? On the basis that this plan has been constructed by professional planners, we could not consider ourselves qualified to challenge its legality, subsequently we are compelled to respond "YES" to this question. However, this submission sets out to indicate that CPBC draft Reg19 consultation may well prove to be unsound or even illegal, being neither positively prepared nor adequately evidenced. The advice provided at 1.09 and 1.10 of this submission, has not been made lightly and goes some way to support our argument that adopting a wholly no Green Belt development policy, at the expense of public safety is somewhat perverse. Prioritising mainland Green Belt protection without fully accounting for major incident hazard range and the potential for catastrophic flood events on Canvey Island, effectively subdividing the borough's								

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								designated Hazardous Substances Authority. These sites pose significant risks due to the nature of materials handled and their proximity to the existing and proposed increase of residential areas. The absence of a clear direction undermines CPBC's statutory responsibilities and leaves a critical gap in strategic planning, emergency preparedness, and community safety. 2.05 The description of these being Hazardous Sites somewhat discredits their			communities, may make the draft CPBC Plan be deemed not only unreasonable but also unprincipled and corporately illogical.								

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								potential to do harm. These are in fact Major Hazardous Sites categorised as “UPPER TIER ESTABLISHMENTS” described as follows. Establishments 2.06 The term “Establishment” generally relates to the whole location under the control of an operator whose activities involve installations handling specified dangerous substances, present in specified quantities. Installation 2.07 The term “Installation”											

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								generally means a technical unit within an “Establishment” whether at or below ground level, in which dangerous substances are produced, used, handled or stored and includes all equipment, structures, pipelines, machinery, tools, private railways sidings, docks, unloading quays serving the installation, jetties, warehouse or similar structures, floating or otherwise necessary for the operation of that installation											

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								Domino Effect. 2.08 The proximity of the “Establishments of Oikos and Calor and their Installations,” could be the source of, or increase the risk or consequences, of a major accident and of domino effects. Off-Site Hazard Range Major Accident Consequence Analysis. 2.09 Many things can go wrong at major hazardous sites and despite the risk being maintained to, as low as reasonably practicable, residual risk remains.											

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								The serious consequences of unconfined vapour cloud explosions, flash fires, and BLEVEs are very well known. Undertaking “Off- Site Hazard Range Consequence Analysis” provides CPBC with a better understanding of impact distance consequence emanating from major accidents. 10 2.10 Given the above, it is imperative that CPBC’s Plan establishes meaningful Major Hazardous Site Local											

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								Policies that support objectives preventing major accidents and limiting the off-site consequences of such accidents for human health, safety and the environment. Such policies, informed by the information provided by Upper Tier Establishments Safety Reports, specifically to assist with incumbent Off-Site Emergency and Land-Use-Planning.											

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0220 - 0005	Individual	Steve	Sawkins		Yes	GB1		CPBC Plan Page 126 5.01 We welcome and support the CPBC Plan’s desire to protect the Borough’s Green Belt. However we are most concerned at some of the findings contained in the Castle Point Green Belt Assessment. 5.02 The broader functions of the Canvey Island Green Belt, beyond the official Purposes, have received little importance and weight. It is apparent that the CPBC Plan indicates	No	Positively Prepared, Effective, Justified, Consistent with National Policy	Summary Statement This representation is submitted in response to the Regulation 19 consultation on the Castle Point Borough Council Local Plan 2026–2043. It is our view that the Plan fails all four tests of soundness as defined in the National Planning Policy Framework (NPPF). The Plan is underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. 1. Is the Plan Positively Prepared ? The Plan is not positively prepared to meet the area’s objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. The Plan selectively identifies flood risk constraints (Footnote 7) and then actively proposes development in those high-risk areas. The NPPF 2024 explicitly removes the ability for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints		Yes	To introduce and explain any extra specific supporting evidence in relation to the matters raised in this submission during the Examination in Public (EiP) process		C	The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. Welcome and support the CPBC Plan’s desire to protect the Borough’s Green Belt. However we are most concerned at some of the findings contained in the Castle Point Green Belt Assessment. The broader functions of the Green Belt, covered under policy GB2. Non-Green Belt factors in relation to these sites are considered in the SLAA and SA. 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 capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us	N	

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								little enough weight given to assets included within areas GB1, GB2 and GB3. 5.03 We consider that the latest CPBC Green Belt Assessment is wrong to indicate that Parcels GB1 and GB2 in particular, should be identified as potential Grey Belt. Both Parcels meet the PPG criteria to remain as Green Belt. 5.04 Annex 2 of the NPPF defines Grey Belt Land, as land in the Green Belt comprising previously developed			on Canvey Island, it paradoxically allocates significant housing development to West Canvey. Conclusion: The Plan does not seek to meet development needs in a sustainable or safe manner. 2. Is the Plan Justified ? The Plan lacks proportionate evidence and fails to consider reasonable alternatives. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequencebased analysis for vulnerable populations. Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-prone areas, without demonstrating that safer alternatives were adequately considered. It fails to identify Canvey Island as a single flood cell requiring open space catchment areas for flood mitigation . Whilst the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey, despite failing to provide the required Level II SFRA Conclusion: The Plan is not based on proportionate evidence and fails to justify its						beyond the official Purposes, have received little importance and weight	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. 2018 Green Belt Assessments still form part of the evidence and considered wider areas.	

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								land and/or any other land that does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143 of the NPPF. 5.05 Quite clearly GB1 and GB2, Very Strongly contribute to Purpose a) to check the unrestricted sprawl of large built-up areas; Canvey Island being the most densely populated area within Castle Point. 5.06 Besides this, GB1, GB2 and GB3 all contribute to Purpose e) to assist in urban regeneration, by			spatial strategy. 3. Is the Plan Effective ? The Plan is not effective or deliverable given the known constraints. Major allocations such as West Canvey Island and the Seaview Road corridor lie within flood zones and lack infrastructure to support emergency planning. Pressures on roads and healthcare are acknowledged but not resolved through binding delivery mechanisms. The primary housing site is not shovel-ready and faces significant delivery time constraints, undermining the Plan's ability to meet urgent housing needs. Conclusion: The Plan is not deliverable without significant risk to public safety and infrastructure capacity. 4. Consistent with National Policy ? The Plan fails to meet the housing targets set by the Standard Methodology and does not integrate consequence-based planning for flood risk or hazardous installations. This is contrary to NPPF guidance and Planning Practise Guidance on safe development and resilience. Furthermore, the Plan does not reflect legal duties under the Civil Contingencies Act 2004 or COMAH Regulations to plan for foreseeable emergencies. Conclusion: The Plan is inconsistent with national policy and statutory obligations for								

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								encouraging the recycling of derelict and other urban land. As indicated by the CPBC Plan's development proposals for Canvey Island. 5.07 Furthermore, these parcels fall within the protections of Footnote 7. Parcel GB1 containing the Dutch Cottage a Listed Building. Parcel GB2 directly abutting a now rare Roman Saltern, a Scheduled Monument, of which Historic England note that in Essex, only a very small number			riskinformed development. In light of the above, we respectfully request that the Castle Point Local Plan 2026–2043 be withdrawn or substantially revised to address the issues raised in this representation. The Plan must be re-evaluated to ensure it meets the tests of soundness, prioritises public safety, and complies with national policy and legal obligation. Is the Plan Legal ? On the basis that this plan has been constructed by professional planners, we could not consider ourselves qualified to challenge its legality, subsequently we are compelled to respond "YES" to this question. However, this submission sets out to indicate that CPBC draft Reg19 consultation may well prove to be unsound or even illegal, being neither positively prepared nor adequately evidenced. The advice provided at 1.09 and 1.10 of this submission, has not been made lightly and goes some way to support our argument that adopting a wholly no Green Belt development policy, at the expense of public safety is somewhat perverse. Prioritising mainland Green Belt protection without fully accounting for major incident hazard range and the potential for catastrophic flood events on Canvey Island, effectively subdividing the borough's								

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								remain. 11 GB2 with a strong boundary at the Southern and Eastern edges marked by the Hill Hall Dyke, a designated Main River. 12 5.08 GB1, GB2 and GB3 all fall within Tidal Flood Zone 3. Within a particularly vulnerable Area, reliant on the Tidal Barriers giving sole protection from Flooding, due to there being a lack of sea wall defence alongside the Benfleet Station area, and the vulnerable			communities, may make the draft CPBC Plan be deemed not only unreasonable but also unprincipled and corporately illogical.								

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								clay banking sea defence alongside the RSPB land. 5.09 Development within any of these areas should constitute inappropriate development and amount to, reason enough to remain within the Green Belt Boundary and not to be considered Grey Belt. 5.10 We are concerned that these parcels have received a strategic re-branding, GB1, GB2 and GB3. During previous CPBC attempts at Plan-											

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								making they have been numbered Area 23 and Area 26. It is reasonable to consider that there may well be a specific reason to draw these areas to prominence within the Borough's Green Belt parcels, to which we can only conclude what the CPBC Core Strategy Examining Inspector Mr P.Crysell identified as“Local Factors,”remains active and relevant today. Building any housing in flood zone 3, without at least first											

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								looking at alternatives, sequentially outside of these high risk areas (in addition to the Comah sites) is indeed unreasonable, having already identified Canvey Island Brownfield spaces for Housing.											

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0220 - 0006	Individual	Steve	Sawkins		Yes	C7	Yes	CPBC Plan Page 46 4.01 Extract from the 6-Point Plan for Canvey Island, concerning Canvey Lake. "The Section 19 Flood Investigation Report, published by Essex LLFA in September 2014, recommended a thorough investigation into the capacity available in the Canvey Lake. The lake, strategically located in the centre of the Island, forms part of the Island's surface water drainage system and so ensuring it is kept in a	No	Positively Prepared, Effective, Justified, Consistent with National Policy	Summary Statement This representation is submitted in response to the Regulation 19 consultation on the Castle Point Borough Council Local Plan 2026–2043. It is our view that the Plan fails all four tests of soundness as defined in the National Planning Policy Framework (NPPF). The Plan is underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. 1. Is the Plan Positively Prepared? The Plan is not positively prepared to meet the area's objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. The Plan selectively identifies flood risk constraints (Footnote 7) and then actively proposes development in those high-risk areas. The NPPF 2024 explicitly removes the ability for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints		Yes	To introduce and explain any extra specific supporting evidence in relation to the matters raised in this submission during the Examination in Public (EiP) process		C	No works have been done on Canvey Lake in 10 years despite the 6 point plan	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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								good condition and able to receive surface water during storm events is vital.” 4.02 More Importantly; “In a further report by the government’s Chief Scientist, Sir Mark Walport, it was also mentioned that capacity of this lake needed to be addressed and maintained.” 4.03 “The MAP has completed the first phase of modeling the impacts of dredging the lake, to remove large amounts of silt which have			on Canvey Island, it paradoxically allocates significant housing development to West Canvey. Conclusion: The Plan does not seek to meet development needs in a sustainable or safe manner. 2. Is the Plan Justified ? The Plan lacks proportionate evidence and fails to consider reasonable alternatives. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequencebased analysis for vulnerable populations. Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-prone areas, without demonstrating that safer alternatives were adequately considered. It fails to identify Canvey Island as a single flood cell requiring open space catchment areas for flood mitigation . Whilst the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey, despite failing to provide the required Level II SFRA Conclusion: The Plan is not based on proportionate evidence and fails to justify its								

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								built up over time. The group has also suggested re-profiling the banks of the lake, to provide additional storage capacity in high intensity rainfall events. This increased storage capacity could allow surface water to drain away from the network more effectively, whilst increasing the amount of water that could be held. It has been identified that any work on the lake would need to be followed by a regular			spatial strategy. 3. Is the Plan Effective ? The Plan is not effective or deliverable given the known constraints. Major allocations such as West Canvey Island and the Seaview Road corridor lie within flood zones and lack infrastructure to support emergency planning. Pressures on roads and healthcare are acknowledged but not resolved through binding delivery mechanisms. The primary housing site is not shovel-ready and faces significant delivery time constraints, undermining the Plan's ability to meet urgent housing needs. Conclusion: The Plan is not deliverable without significant risk to public safety and infrastructure capacity. 4. Consistent with National Policy ? The Plan fails to meet the housing targets set by the Standard Methodology and does not integrate consequence-based planning for flood risk or hazardous installations. This is contrary to NPPF guidance and Planning Practise Guidance on safe development and resilience. Furthermore, the Plan does not reflect legal duties under the Civil Contingencies Act 2004 or COMAH Regulations to plan for foreseeable emergencies. Conclusion: The Plan is inconsistent with national policy and statutory obligations for								

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								planned maintenance programme.” 4.04 Canvey Lake is clearly one of the main assets within the Canvey Island surface water drainage system. Despite this and the findings of the government’s Chief Scientist, Sir Mark Walport’s, and the 6–Point Plan recognition , that it is “vital” for the Lake to be kept in good condition to perform its strategic function during storm events, no major work, nor maintenance			risk informed development. In light of the above, we respectfully request that the Castle Point Local Plan 2026–2043 be withdrawn or substantially revised to address the issues raised in this representation. The Plan must be re-evaluated to ensure it meets the tests of soundness, prioritises public safety, and complies with national policy and legal obligation. Is the Plan Legal ? On the basis that this plan has been constructed by professional planners, we could not consider ourselves qualified to challenge its legality, subsequently we are compelled to respond "YES" to this question. However, this submission sets out to indicate that CPBC draft Reg19 consultation may well prove to be unsound or even illegal, being neither positively prepared nor adequately evidenced. The advice provided at 1.09 and 1.10 of this submission, has not been made lightly and goes some way to support our argument that adopting a wholly no Green Belt development policy, at the expense of public safety is somewhat perverse. Prioritising mainland Green Belt protection without fully accounting for major incident hazard range and the potential for catastrophic flood events on Canvey Island, effectively subdividing the borough’s								

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								ce, on the Lake has been undertaken, in the 10 years since the 2014 Summer Floods.			communities, may make the draft CPBC Plan be deemed not only unreasonable but also unprincipled and corporately illogical.								

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1217 - 0001	Individual	Eunice	Sawyer			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1217 - 0002	Individual	Eunice	Sawyer			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1217 - 0003	Individual	Eunice	Sawyer			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
0874 - 0001	Individual	Neil	Saye		Yes	HAD4	Yes		No	Effective	114 new homes to be built on this already busy area will have a profound effect on traffic, parking and under-strain services, such as schools and doctors. Scrub Lane can not in any way support this amount of new housing in such a dense concentration	At most 20 houses could reasonably be built on this piece of land	No	Not Answered	Not Answered	A	Objecting to HAD4 because: Parking Traffic Infrastructure Density	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	N

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																		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. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.	

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0843 - 0001	Individual	SUSAN	SCANLAN		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, 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 towards a "no greenbelt build policy", is solely 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. 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. The Had2 policy is about protecting this greenbelt site as not suitable for development, but an unsound plan 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	Not Answered	Not Answered		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 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	N

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											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 policy Had2 with no housing development ever on this farmland site. We need a C6 Policy for this farmland, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							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 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	

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																		option 4) outlines why North West Thundersley was not preferred. 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 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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																		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. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD4	
0807 - 0001	Individual	Josh	Scanlon		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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0014 - 0001	Individual	Frances	Scarff		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	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	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	Not Stated		No			Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and inadequate infrastructure. • Supports inclusion of North West Thundersley (Blinking Owl site) as a more sustainable and accessible strategic growth location. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites	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 • 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. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery	N

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								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			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 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)	ities, 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. Essex County Council is investing in infrastructure and would be legally obliged to					vulnerable to speculative development. • Challenge the soundness and legal compliance of the Plan under the NPPF, particularly regarding the Duty to Cooperate and Sustainability Appraisal. • Calls for modifications to reduce pressure on Canvey and include North West Thundersley.	mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								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			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 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	cooperate . North West Thundersley offers a strategic opportunity for sustainable growth.							

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								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			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,								

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								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 constructiv			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. 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								

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								e 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			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, 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								

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								ire 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			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 demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous								

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								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 undermini			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 Fairglens 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,								

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								ng 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			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								

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								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.			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. 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								

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								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			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.								

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								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;											

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								they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											
0014 - 0002	Individual	Frances	Scarff		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	No	Not Stated			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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								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											

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								risks being found unsound on procedural grounds alone.											
0060 - 0001	Individual	Neil	Scarff		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.	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	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	Not Stated		No	A	Objections on: • 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	• Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • 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.	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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								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			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 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	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. Essex County Council is					implementation pathways to address NPPF 180. Mitigation measures identified but theoretical rather than practical. • Canvey: Concerns over flood risk. SUDS must be designed with a full understanding of Canvey's unique drainage context. • Green Belt: Welcome decision not to include green belt sites. • North West Thundersley should have been included.	• Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. 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 also have been considered through the the SFRA. Comments noted.	

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								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			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 discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The	investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.							

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								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			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 as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised								

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								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			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. 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								

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								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			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, 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								

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								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			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 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								

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								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 demonstra			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 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								

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								ble 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			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, 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								

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								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			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 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								

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								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			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 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.								

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								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											

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								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.											
0060 - 0002	Individual	Neil	Scarff		Yes	Forword	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful	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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								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											

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								risks being found unsound on procedural grounds alone.											
0805 - 0001	Individual	Steven	Scarlett		Yes	C5	No	The emergency services will not be able to respond to an emergency on the island due to the excess houses/people moving onto the island and without greater road and service infrastructure in place.	No	Effective	Failure to put adequate road infrastructure in place to support the additional people moving onto the island will restrict the emergency services to respond effectively	Provide additional roads and access onto and off the island	No	Not Answered	Not Answered		Emergency services will be unable to access Canvey	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
1053 - 0001	Individual	Heleen	Scarlett		Yes	SP3	Yes	Building on greenbelt land is awful. We need grass and trees. We have not got the infrastructure to support more homes - roads,	No	Effective, Justified		This isn't nonsense about wording. Stop allowing developers to make a fortune at the expense of existing residents.	Not Answered	Not Answered	Not Answered		No building on greenbelt land Infrastructure	The Castle Point Plan does not allocate any development on Green Belt Plan Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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								doctors etc.											
1182 - 0001	Individual	Clive	Schooling			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-	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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	

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																	infrastructure , the proposed 3316 urban homes for Canvey is not resident led	options have been considered through the SFRA.	
1182 - 0002	Individual	Clive	Schooling			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									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. 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
								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1182 - 0003	Individual	Clive	Schooling			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

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
1266 - 0001	Individual	Paul	Scott			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1266 - 0002	Individual	Paul	Scott			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									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. 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
								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1266 - 0003	Individual	Paul	Scott			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

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
0386 - 0001	Individual	Delia	Searle		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.					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	<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> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	selecticti on 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.	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>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey 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	

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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.	
0386 - 0002	Individual	Delia	Searle		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.					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/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
0386 - 0003	Individual	Delia	Searle		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 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. All; Greenbelt sites on Canvey West need total protection from government intervention. 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. 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	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: Establish firm 2 year timeline for comprehensive lake dredging with dedicated funding and delivery agency. Create annual maintena	No			A	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 the lake is upheld and will detail who is responsible for this.	N

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											delivery mechanisms and ongoing maintenance commitments. 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 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.	nce dredging schedule with long-term budget allocation . Set measurable targets for lake capacity increase and water quality improvements. Designate responsible agency for ongoing lake management with annual progress reporting and community consultation. COMMUNITY ENGAGEMENT: Engage with Friends of Canvey Lake, a community group, with 2.5k members champion								

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												ing the reset of Canvey Lake to its pre-2010 conditions, to ensure resident-led lake management improvements.							
0387 - 0001	Individual	Bernard	Searle		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.					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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	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	Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <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>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting	

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																	highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	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.	
0387 - 0002	Individual	Bernard	Searle		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.					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/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
0387 - 0003	Individual	Bernard	Searle		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 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. All; Greenbelt sites on Canvey West need total protection from government intervention. 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. 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	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: Establish firm 2 year timeline for comprehensive lake dredging with dedicated funding and delivery agency. Create annual maintena				A	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 the lake is upheld and will detail who is responsible for this.	N

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											delivery mechanisms and ongoing maintenance commitments. 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 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.	nce dredging schedule with long-term budget allocation . Set measurable targets for lake capacity increase and water quality improvements. Designate responsible agency for ongoing lake management with annual progress reporting and community consultation. COMMUNITY ENGAGEMENT: Engage with Friends of Canvey Lake, a community group, with 2.5k members champion								

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												ing the reset of Canvey Lake to its pre-2010 conditions, to ensure resident-led lake management improvements.							
0388 - 0001	Individual	Tracy	Searle		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.					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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	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.	
0388 - 0002	Individual	Tracy	Searle		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.					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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0388 - 0003	Individual	Tracy	Searle		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 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. All; Greenbelt sites on Canvey West need total protection from government intervention. 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. 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	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: Establish firm 2 year timeline for comprehensive lake dredging with dedicated funding and delivery agency. Create annual maintena				A	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 the lake is upheld and will detail who is responsible for this.	N

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											delivery mechanisms and ongoing maintenance commitments. 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 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.	nce dredging schedule with long-term budget allocation . Set measurable targets for lake capacity increase and water quality improvements. Designate responsible agency for ongoing lake management with annual progress reporting and community consultation. COMMUNITY ENGAGEMENT: Engage with Friends of Canvey Lake, a community group, with 2.5k members champion								

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												ing the reset of Canvey Lake to its pre-2010 conditions, to ensure resident-led lake management improvements.							
0447 - 0001	Individual	Abigail	Sellick		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant ,	Support noted.	N
0179 - 0001	Individual	Tracy	Sewell		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 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	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. 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	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

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								Thundersley. It has no credible five-year housing land supply.			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	considered through the SFRA.	Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		
0179 - 0002	Individual	Tracy	Sewell		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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1211 - 0001	Individual	Heather	Shackleton			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1211 - 0002	Individual	Heather	Shackleton			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1211 - 0003	Individual	Heather	Shackleton			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
0009 - 0001	Individual	Robert	Sharp		Yes	SP3	Yes	Dear Sir Thank you for your Aug 1 Consultaion The citizens of Castle Point are concerned that the thought of introducing further	Yes				Not Stated		No	A	Resident objects to further housing due to severe traffic congestion in Benfleet, Canvey, and Hadleigh, and calls	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	N

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								housing without addressing the existing major road congestion would be intolerable . As I am sure you know, unacceptable traffic congestion already occurs every morning and evening in Benfleet, Canvey & Hadleigh. This will only get worst with the housing expansion already planned for Southend and Shoebury as the only access is via CastlePoint. Every new house tends to add two cars. Action should be									for new access roads before any development proceeds.	to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Infrastructure Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	

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								taken as follows: 1) Before any new housing estates are even considered , new access roads need to be built in Benfleet, Hadleigh & Canvey 2) This may be possible from Canvey by a road to link with further up the A13 at Fobbing thus easing Canvey Way/A13 junction. Also possibly a link direct to Leigh for access to Southend. 3) More difficult however, is adding new access roads in South Benfleet and											

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								Hadleigh. The area is already congested with housing which proves our concern, we cannot build any more major housing except maybe the odd fill ins. 4) This suggests more housing would be impractical for traffic reasons, in addition to increase in demand for doctors, schools and other essential services. You state that 'delivery of development accords with the needs of the area', exactly, and more housing is											

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								not a demand for the residents in CP. I would appreciate your views when available and I am ready to meet if you need me to attend any meetings.											
0074 - 0001	Individual	Robert	Sharp		Yes	SP3	Not Stated	The citizens of Castle Point are concerned that the thought of introducing further housing without addressing the existing major road congestion would be intolerable. As I am sure you know, unacceptable traffic congestion already occurs every morning and evening in	No	Not Stated	Therefore the plan currently fails on Soundless grounds as adequate access via roads to proposed new sites is impossible. Can you arrange for the department who will construct the new roads to advise residence accordingly and include these in your plan. A meaningful plan should include new access roads together with how increase demand to doctors, schools and other essentials needed by a larger population are to be achieved. I recognise the Government's pressure on you to expand [REDACTED Inappropriate Language]	Action should be taken as follows: 1) Before any new housing estates are even considered, new access roads need to be built in Benfleet, Hadleigh & Canvey 2) This may be possible from Canvey by a road to link with further up the A13 at Fobbing thus easing	Not Stated		No	A	The Plan currently fails on Soundless grounds as adequate access via roads to proposed new sites is impossible. 1) Currently Castle Point is already log-jammed with traffic congestion both mornings and evenings and access is	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	N

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								Benfleet, Canvey & Hadleigh. This will only get worst with the housing expansion already planned for Southend and Shoebury as the only access is via CastlePoint. Every new house tends to add two car. You state that 'delivery of development accords with the needs of the area', exactly, and more housing is not a demand for the residents in CP. This plan is better than the previous Council's Plan but there are still a				Canvey Way/A13 junction. Also possibly a link direct to Leigh for access to Southend. 3) More difficult however, is adding new access roads in South Benfleet and Hadleigh. The area is already congested with housing which proves our concern, we cannot build any more major housing except maybe the odd fill ins. 4) This suggests more housing would be impractical for traffic					intolerable. Problem has grown recently due to two reasons a) Recent increase in number of two car households within the borough and b) Recent new housing estates built in Shoebury & Southend who have to access Castle Point when traveling by car. 2) Your plan proposes even building more houses in Benfleet and Canvey but does not include any new access roads.		

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								number of issues I wish to raise after attending one of your meetings. 1) Currently Castle Point is already log-jammed with traffic congestion both mornings and evenings and access is intolerable . Problem has grown recently due to two reasons a) Recent increase in number of two car households within the borough and b) Recent new housing estates built in Shoebury & Southend who have to access				reasons, in addition to increase in demand for doctors, schools and other essential services. Suggestion, a) new road directly from Canvey to Leigh and b) new road east of Canvey to Fobbing area on A13. Both will ease CP.					This will make the traffic jams even worse. You advise that its not the Council's responsibility to plan new access roads, it for another department. Therefore your current plan is unsustainable as published . 3) New access roads are a must if new houses are to be built. However, constructing new access roads in Benfleet is infeasible unless you tear down some		

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								Castle Point when traveling by car. 2) Your plan proposes even building more houses in Benfleet and Canvey but does not include any new access roads. This will make the traffic jams even worse. You advise that its not the Council's responsibility to plan new access roads, it for another department. Therefore your current plan is unsustainable as published. 3) New access roads are a must if new houses are to be built.									houses to make space - defeating the object of more homes! It is possible to construct new roads off Canvey away from Castle Point. Suggestion, a) new road directly from Canvey to Leigh and b) new road east of Canvey to Fobbing area on A13. Both will ease CP. I recognise the Government's pressure on you to expand but why do we need more housing.		

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								However, constructing new access roads in Benfleet is infeasible unless you tear down some houses to make space - defeating the object of more homes! It is possible to construct new roads off Canvey away from Castle Point.											

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0363 - 0001	Individual	Jill	Shaw		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 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 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	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.							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 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	

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																		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 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	

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																		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. 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 capacity of the highway network in and around Castle	

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																		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. 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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0401 - 0001	Individual	Margaret	Shaw		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 totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recretaional, nature recovery, biodiversity, agricultrual, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage sitem 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, 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					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 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	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.							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 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	

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																		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 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	

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																		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. 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 capacity of the highway network in and around Castle	

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																		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. 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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0822 - 0001	Individual	Trevor	Shaw		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, 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	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	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 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	N

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											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. 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.												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 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	

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																		option 4) outlines why North West Thundersley was not preferred. 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 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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																		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. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD3	

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1289 - 0001	Individual	Anita	Shean			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1289 - 0002	Individual	Anita	Shean			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1289 - 0003	Individual	Anita	Shean			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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1290 - 0001	Individual	John	Shean			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1290 - 0002	Individual	John	Shean			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									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. 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
								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1290 - 0003	Individual	John	Shean			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

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
1221 - 0001	Individual	Kenneth	Sheilds			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1221 - 0002	Individual	Kenneth	Sheilds			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1221 - 0003	Individual	Kenneth	Sheilds			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

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
0354 - 0001	Organisation	Mark	Sheppard	South end City Council		SP3	Yes	In relation to the strategic position of Castle Point within South Essex, we support highlighting the important inter-connections between Southend-on-Sea and Castle Point in terms of transport, employment, education and skills, and environmental assets. Leigh Port could be added to the diagram to recognise its economic and tourism role for the South Essex economy. The vision and objectives	No	Not Stated	Southend-on-Sea City Council will be updating its Green Belt study to reflect the National Planning Policy Framework 2024 and will engage with you and with Rochford District Council as neighbouring Green Belt authorities in relation to the study methodology. As you will be aware, Southend-on-Sea City Council is currently consulting on its Local Plan – Preferred Approach with Options document at Regulation 18. This includes draft policies and potential site allocations. Evidence indicates that even if all the potential sites that have been promoted for development in Southend were to be carried forward as site allocations, Southend would be unable to meet its housing need in full using the Government’s new Standard Method. This remains the case even if a sizeable windfall allowance could be demonstrated over the plan period. Unmet housing needs deriving from Southend is estimated to be between 10,000 to 14,000 dwellings to 2040. Furthermore, as you are aware, Southend also has a number of physical constraints in addition to being predominantly a built-up urban area with coastline to the south and east (and associated environmental designations), it also has a relatively small amount of undeveloped land, which forms part of the Metropolitan Green Belt. As such, we reiterate for the purposes of this consultation that Southend-on-Sea City					A	An objection is raised in relation to ‘soundness’ of the Plan due to the failure to meet identified housing need, and importantly lack of robust evidence for this shortfall and 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 housing need in full or ‘closed	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 section b (i) and (ii) give an acknowledgement of circumstances in which national policy does not expect Standard Method outcomes to be met in full. This includes situations where: • the application of policies in this Framework that protect areas or assets of particular	N

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								as proposed are also supported. Southend-on-Sea City Council will continue to work together with Castle Point Borough Council to further the objectives related to these cross-boundary issues. Policy SP3 states that the Castle Point Plan will deliver a minimum of 6,196 new homes over the period 2026 to 2043. The starting point for assessing housing need is the standard methodology set by the Government, which			Council is unable to accommodate any of Castle Point's unmet housing need. However, we will of course continue to engage positively with you as both respective local plans are progressed. We have written to you separately requesting whether CPBC can assist in meeting any of the housing need deriving from Southend. The potential lower end of Southend unmet needs to 2040 (10,000 homes) includes all sites promoted to the local plan and a sizeable windfall allowance. This is not the case for CPBC Local Plan where a number of sites have been discounted in the Regulation 19 version of the plan. Given the significant sub-regional housing pressure and potential scale of unmet needs there should be strong and evidenced reasons as to why development is being restricted and potential development sites not included within the CPBC Local Plan. Ultimately, CPBC should be confident it is submitting a 'sound' plan where omission sites can be robustly justified at examination. Given the above, an objection is raised in relation to 'soundness' of the CPBC local plan due to the failure to meet identified housing need, and importantly lack of robust evidence for this shortfall and justification for the dismissal of alternative spatial strategy options and previously considered Green Belt development sites that might have enabled the Borough to						the gap'. The not insignificant constraints in relation to flood risk and international and national biodiversity designations are also recognised. There is also a significant proportion of land designated as metropolitan green belt within the Borough. The submission Local Plan should set out clearly the rationale for the spatial strategy proposed, including the consideration and rejection	importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area 7 ; or • any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. Footnote 7 clarifies this position by providing a list of constraints. Green Belt is, prominently, among these, as is flooding. Paragraph: 002 Reference ID: 3-002-20190722 of the PPG advises that "Plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations..." The NPPF footnotes set out the areas where the Framework would provide strong reasons for restricting the overall scale, type or distribution of development in the plan area (such as	

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								equates to 11,662 dwellings over the plan period for the Borough of Castle Point. The housing supply in SP3 is clearly a significant shortfall against the government's standard method. The draft plan notes at paragraph 6.41 that a forensic review of potential urban capacity has been undertaken. The not insignificant constraints in relation to flood risk and international and national biodiversity designations are also recognised			meet its housing need in full or 'closed the gap'. We would welcome the opportunity engage further with CPBC on this issue and to produce an agreed Statement of Common Ground between Southend-on-Sea and Castle Point Councils regarding plan making, to set out areas of agreement.						of all sites being promoted, and the assumptions built into urban site densities. The spatial strategy as set out in this Regulation 19 consultation does not seek to allocate Green Belt sites. Justification includes a focus on impacts on the existing transport network, potential impact on heritage assets, and physical/market capacity, amongst others. The Castle Point Green Belt	the Green Belt and other protected areas)." 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 development as outlined in the Housing Capacity Topic Paper August 2025.	

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								. There is also a significant proportion of land designated as metropolitan green belt within the Borough. Regarding brownfield development and urban regeneration - we are keen to work with you to develop a consistent approach to the optimisation of site densities where applicable, taking into account local character and context (for example the A13 London Road, which has seen intensification in recent									Assessment (2025), it is noted, provides a finer grain assessment of green belt and has identified a number of sub areas of potential grey belt within the Borough, with Policy GB2 setting out the approach to managing previously developed land in the green belt. Note the NPPF guidelines for Green Belts Support omission of GB8 Land South of Hadleigh.		

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								years, forms a continuous transport link between the authorities). We would welcome further dialogue in relation to future plans for Hadleigh Town Centre which could have impacts on traffic movements into/ out of Southend. The submission Local Plan should set out clearly the rationale for the spatial strategy proposed, including the consideration and rejection of all sites being promoted,											

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								and the assumptions built into urban site densities. It is noted that the previous version of the Castle Point Local Plan that was found sound at examination, but not subsequently adopted, considered a number of green belt sites for potential allocation, to contribute towards housing need in the Borough. However, the spatial strategy as set out in this Regulation 19 consultation does not seek to allocate Green Belt sites. Justificatio											

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								n includes a focus on impacts on the existing transport network, potential impact on heritage assets, and physical/market capacity, amongst others. The Castle Point Green Belt Assessment (2025), it is noted, provides a finer grain assessment of green belt and has identified a number of sub areas of potential grey belt within the Borough, with Policy GB2 setting out the approach to managing previously developed											

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								land in the green belt. Green Belt land should only be identified for release following a Green Belt review and where exceptional circumstances are fully evidenced and justified as per the National Planning Policy Framework (NPPF). As you are aware paragraph 146 of the NPPF states 'Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for											

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								homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the											

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								plan'. We previously objected (in September 2024) to the inclusion within the Regulation 18 Issues and Options consultation of site GB8 Land South of Hadleigh. This land has a historical context and visually and functionally performs strongly in serving a Green Belt purpose of separating the two settlements of Southend and Hadleigh. This function would likely be significantly eroded by the partial or											

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								complete release of GB8 from the Green Belt. The omission of this site from the current consultation is therefore supported.											
0354 - 0002	Organisation	Mark	Sheppard	South end City Council		SP4	Not Stated	We will continue to work collaboratively with you in developing our respective Infrastructure Delivery Plans as there are many areas including transport, health, education, utilities and community facilities where our residents	Not Stated	Not Stated	The policies for biodiversity and landscape are supported. We will continue to work with you to develop a Riverside Approach within our respective local plans that recognises the importance of the environmental, social, cultural and economic role of the Thames Estuary foreshore and how it can best adapt to a changing climate.					A	SCC will continue to work collaboratively with CPBC in developing our respective Infrastructure Delivery Plans as there are many areas including transport, health, education, utilities and community facilities where our residents	Noted	N

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								access services across administrative boundaries . We would welcome further dialogue in terms of transport planning.									access services across administrative boundaries . Would welcome further dialogue in terms of transport planning. The policies for biodiversity and landscape are supported . We will continue to work with you to develop a Riverside Approach within our respective local plans that recognises the importance of the environmental, social, cultural and economic role of the Thames Estuary		

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																	foreshore and how it can best adapt to a changing climate.		
0354 - 0003	Organisation	Mark	Sheppard	South end City Council		SD1	Yes	The London Fenchurch Street to Shoeburyness railway line is a key transport route for Southend residents to access jobs and leisure opportunities. We will continue to work in collaboration with Castle Point Borough Council, the Environment Agency and transport agencies to manage flood risk and build in long-term resilience for the railway line.	Yes							A	The London Fenchurch Street to Shoeburyness railway line is a key transport route for Southend residents to access jobs and leisure opportunities. We will continue to work in collaboration with Castle Point Borough Council, the Environment Agency and transport agencies to manage flood risk and build in long-term resilience	Noted	N

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																	for the railway line.		
0354 - 0004	Organisation	Mark	Sheppard	South end City Council		Monitoring Framework	Not Stated		Not Stated			Finally, within the proposed Monitoring Framework, we suggest monitoring the percentage of Health Impact Assessments submitted in accordance with relevant application thresholds. An additional indicator is also suggested to monitor the number of new community use agreements (objective 20).				A	Within the proposed Monitoring Framework, we suggest monitoring the percentage of Health Impact Assessments submitted in accordance with relevant application thresholds. An additional indicator is also suggested to monitor the number of new community use agreements (objective 20).	Mods proposed - Monitoring Framework Objective 19 – update the monitoring indicator to read as “~~submission~~ percentage of health impact assessments submitted for relevant applications” - Monitoring Framework Objective 20 – additional monitoring indicator included to read as “number of new community use agreements per year”	Y
0354 - 0005	Organisation	Mark	Sheppard	South end City Council		Forward	Not Stated	In relation to the strategic position of	Not Stated							A	The vision and objectives as proposed	Mod proposed: The Strategic Position of Castle Point within South Essex –	Y

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								Castle Point within South Essex, we support highlighting the important inter-connections between Southend-on-Sea and Castle Point in terms of transport, employment, education and skills, and environmental assets. Leigh Port could be added to the diagram to recognise its economic and tourism role for the South Essex economy. The vision and objectives as proposed are also supported.									are supported . Support highlighting the important inter-connections between Southend-on-Sea and Castle Point in terms of transport, employment, education and skills, and environmental assets. . Request Key diagram is to be updated to include Leigh Port as “Port Facilities” .	diagram is to be updated to include Leigh Port as “Port Facilities”.	

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								Southend-on-Sea City Council will continue to work together with Castle Point Borough Council to further the objectives related to these cross-boundary issues.											
1089 - 0001	Individual	Volodymyr	Shkuratov		Yes	Whole Plan	No	Please do not allow building on the green belts	Yes				Not Answered	Not Answered	Not Answered		No building on greenbelts	No Green Belt has been allocated within this Castle Point Plan	N
0747 - 0001	Individual	Marco	Siano		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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0390 - 0001	Individual	Stacy	Sibthorpe		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	<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> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	selecticti on 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.	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>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey 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	

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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.	
0390 - 0002	Individual	Stacy	Sibthorpe		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

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0390 - 0003	Individual	Stacy	Sibthorpe		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 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. All; Greenbelt sites on Canvey West need total protection from government intervention. 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. 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	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: Establish firm 2 year timeline for comprehensive lake dredging with dedicated funding and delivery agency. Create annual maintena							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 the lake is upheld and will detail who is responsible for this.	N

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											delivery mechanisms and ongoing maintenance commitments. 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 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.	nce dredging schedule with long-term budget allocation . Set measurable targets for lake capacity increase and water quality improvements. Designate responsible agency for ongoing lake management with annual progress reporting and community consultation. COMMUNITY ENGAGEMENT: Engage with Friends of Canvey Lake, a community group, with 2.5k members champion								

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												ing the reset of Canvey Lake to its pre-2010 conditions, to ensure resident-led lake management improvements.							
1032 - 0001	Individual	Sapphire	Sidey		Yes	HAD4	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	Completely unnecessary and unacceptable putting properties facing a school. These grounds are walked through daily by the children. We do not need more housing!!!! We need more amenities - doctors, dentists. Not more overcrowding!!	Keep some grass land!! Stop making Hadleigh into a concrete jungle. It is so disappointing to see what this council is doing. Focus on green spaces!! Stop focussing on profits!!	No	Not Answered	Not Answered	A	Objecting to HAD4 because: Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Close proximity to the school Close proximity to the school 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.	Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N
1035 - 0001	Individual	Dean	Silk		Yes	Whole Plan	Yes		Yes	Positively prepared	i beleive lot thought went into the local plan and i tottally agree with the plan, and find it leagal and compliant.		No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant	Support Noted	N

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1421 - 0001	Organisation	Mark	Silverman	Star Plans Ltd	Yes	GB1	No	To whom it may concern, Thank you for providing a further opportunity for comments to be provided on the Regulation 19 draft Castle Point Local Plan (2026-2043). I am writing on behalf of the Jewish Community of Canvey Island (JCOCI) Educational Foundation. The JCOCI site on Meppel Avenue is the principal hub for the Jewish community on Canvey Island and has benefited from significant	No		The justification for the removal of MAGB14 is set out in Appendix A and recognises that the majority of the site is developed for educational use. The report notes "that an alteration was sought to the Green Belt boundary in this location within the Borough's previous and withdrawn Local Plan. The Inspector's final report (03.03.22) concluded in paragraph 43 that exceptional circumstances exist for the removal of this area from the Green Belt, although it was concluded that there were no exceptional circumstances to remove the playing fields to the North from the Green Belt." There is no justification for retaining the site in the Green Belt and as such, that aspect of the plan would fail to meet the tests of soundness. JCOCI therefore objects to Policy GB1 – Development affecting the Green Belt which states that "Development within the Green Belt, as defined on the Policies Map, will not be supported in line with the NPPF" (emphasis added). Removal of the site from the Green Belt would facilitate any future development on the site to meet the needs of the Jewish community and avoid a need to demonstrate that the site is grey belt and/or advance very special circumstances, each time a planning application is submitted.	JCOCI would support a main modification on which commits to addressing this anomaly on the Policies Map and would be willing to enter into a Statement of Common Ground with the Council to reflect this.					The JCOCI seeks the removal of Green Belt Parcel MAGB14 from the Green Belt.	Outside of the removal of the Gypsy and Traveller sites and the River Thames there are no removals from the Green Belt. This is inclusive of School Playing Fields.	N

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								investment since being acquired by the community in 2016. The 'urban first' approach in the draft plan is noted along with paragraph 6.33 which states that the plan "seeks to protect the Green Belt in line with the outcomes of the Green Belt Assessment". The draft plan and its accompanying policies map, however, do not reflect the recommendations of the Council's own Green Belt Assessment (July 2025) with regard to											

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								the 'potential major anomalies' identified in the report, including MAGB14 (USP College XTEND Digital Campus and Jewish Community and School, Canvey Island) and the recommended removal of 2.8ha of land at Meppel Avenue from the Green Belt.											

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0509 - 0001	Individual	Julia	Silvester		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 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 procedure s	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 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	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.						Need for a third road to be included in the plan.	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 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.	

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																		Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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 capacity of the highway network in	

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																		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. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey,	

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																		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 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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0509 - 0002	Individual	Julia	Silvester		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 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 has been identified through the Open		N

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																		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.	
0509 - 0003	Individual	Julia	Silvester		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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1208 - 0001	Individual	Chris	Silvester			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1208 - 0002	Individual	Chris	Silvester			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1208 - 0003	Individual	Chris	Silvester			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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1132 - 0001	Individual	Carol	Simmons			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1132 - 0002	Individual	Carol	Simmons			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1132 - 0003	Individual	Carol	Simmons			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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0882 - 0001	Individual	Tracy	Simson		Yes	SP3	No	The Castle Point Plan Draft does not appear to be legally compliant for several reasons: 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 delivery and the impact of local	No	Positively prepared, Effective, Justified, Consistent with national policy	Not positively prepared. The plan proposes significant housing growth across Castle Point, particularly Canvey Island, without delivering the critical infrastructure required to support it. The absence of third access road to Canvey Island undermines the plan's ability to meet the area's need for sustainability or safety. Infrastructure and transport already under significant strain and no realistic solutions included in the draft. Not justified, the strategy appears to prioritise housing numbers over deliverability, safety and sustainability. Brownfield sites proposed for redevelopment including vital community infrastructure. Including, health centres, police and fire station and library. The plan lacks a clear explanation as to why these were chosen over more sustainable or deliverable alternatives, such as low density development of infrastructure, first approaches were adequately considered or consulted on. Not justified. The strategy appears to prioritise housing over deliverability, safety and sustainability. Brownfield sites proposed for redevelopment include vital community services. 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 of	To make the Castle Point Plan Draft legally compliant and sound, the following modifications should be made. 1) infrastructure delivery and access. Policy INI, SP1 Reintroduce and prioritise the creation of a third access road to Canvey as a strategic infrastructure objective within the plan period. Reinstate the West access taskforce to ensure proper delivery oversight	No	Not Answered	Not Answered	A	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 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	N

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								services. proposals to redevelop essential community assets, or health centres, police station, fire station and library. Duty to cooperate not demonstrably fulfilled. The plan shows sufficient evidence that Castle Point Borough Council has worked collaboratively with Essex County Council, the Environment Agency and neighbouring authorities, especially shared infrastructure, flood risk,			infrastructure -first approaches, were adequately considered or consulted on. Not effective. Many sites included in this plan are not demonstrably deliverable. Rebecca Harris NO Anglican stakeholders have pointed out that there is no clear evidence of landowner commitment, infrastructure funding or timeline to bring sites forward. This undermines the plans effectiveness over the plan period. 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 on high flood risk areas, particularly Canvey Island, without adequate mitigation infrastructure or investment in drainage infrastructure directly contradicting NPPF principles. In addition the proposed loss of valued community facilities (library, healthcare and public services) runs counter to national policy on community cohesion, resilience and accessibility.	and consultation with Essex County Council and the Environment Agency. Explicitly state that no further major residential development until this access is secured and funded. 2) site allocations and community facilities (policies HO1 and SP1) Remove or revise proposals to redevelop key community infrastructure is coffeehouse stations, health centres,						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 base unfortunately the council has experienced 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	

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								mitigation and strategic transport such as a third road. 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. Unclear alignment. With local development scheme. The				library and town centre cardboard 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. 3) flood risk and climate resilience (policy CC1) Require a full site specific flood risk							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 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	

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								council own timetable and approach outlined in the local development scheme have shifted repeatedly , rising concerns about whether the statutory process and timeline have been properly followed. Failure to demonstrate deliverability. The sites have been included in the draft without evidence in the draft without evidence of deliverability or landowner commitment.. This				and drainage assessment for all proposed sites on Cancer Island and other flood prone areas before planning permission is granted. Flood risk must be demonstrably reduced and not just managed, through mitigation measures , including sea defences and sustainable urban drainage systems. 4) housing delivery (policy HO1, appendix A) Reduce the plan period from 20 to						relevant transport improvement projects identified in the Local Transport Plan. 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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								may mislead residents and does not meet the requirements to present a plan that can be realistically implemented within the identified timeframe.				15 years to avoid unnecessary overestimation of housing need and reduce strain on infrastructure. Remove sites from housing trajectory that lack evidence of landowner commitment or deliverable 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 healthcar							

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												e capacity are increased . 5) Cross-boundary cooperation and evidence base (policy IM1) Provide an updated and transparent statement of common ground showing joint work with Essex County Council, NHS bodies, utility providers and neighbouring authorities. Including clear timelines, funding plans and inconsiderate for all critical infrastruc							

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												ure, transport, education and health reference in the infrastructure delivery plan. 6) Revised wording (suggested) Current policy SP1 - spatial strategy. "Development on Cancer Island will only be supported where it is demonstrated that adequate emergency access, flood risk mitigation and supplying infrastructure are in place and deliverable within the plan period. Strategic development shall not							

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												proceed in areas with a single access route unless a secondary access is secured).							

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1135 - 0001	Individual	Jan	Sinclair			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1135 - 0002	Individual	Jan	Sinclair			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1135 - 0003	Individual	Jan	Sinclair			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
0076 - 0001	Individual	Tania	Sitch		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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								I consider the draft plan to be sound											
1184 - 0001	Individual	Jeanette	Sizer			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-	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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	

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																	infrastructure , the proposed 3316 urban homes for Canvey is not resident led	options have been considered through the SFRA.	
1184 - 0002	Individual	Jeanette	Sizer			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1184 - 0003	Individual	Jeanette	Sizer			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
1063 - 0001	Individual	Lauren	Skelly		Yes	Whole Plan	No		No	Consistent with national policy			No	Not Answered	Not Answered		Castle Point Plan is not sound and legally compliant	Comments noted.	N

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0833 - 0001	Individual	Gill	Skelton		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 Green Belt/Grey Belt against new NPPF guidelines. It is not justified, the site selection 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 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 conversation, 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 Farm 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	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 and Hadleigh at 305. Total housing target 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 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	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. 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						
											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 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.													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 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	

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																		option 4) outlines why North West Thundersley was not preferred. 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 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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																		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. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD3	
1388 - 0001	Individual	Keith	Skinner		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
1389 - 0001	Individual	Louisa	Skinner		Yes	Whole Plan	Yes	I support the Castle Point Plan Draft I consider	Yes		I consider the Draft Plan to be sound.						Castle Point Plan is sound and legally	Support Noted	N

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								the Draft Plan to be legally compliant									compliant ,		
0395 - 0001	Individual	Joanne	Slator		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 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	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			B - see 0395-0002	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 provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to	N

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											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.							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 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	

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																		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 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	

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																		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. 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	

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																		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. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	
0395 - 0002	Individual	Joanne	Slator		Not Stated	Foreword	Not stated		Not		No one should have to make a Local Plan again. It is a monumental waste of time and		No			None	Does not feel we	Comments noted.	N

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									Stated		many Castle Point Officers are only interested in Londoners and money. Not locals. Not environment. The process has been designed to lock people out from giving views.						need a local plan		
0804 - 0001	Individual	Patria	Slaymaker		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 "overdevelopment of Brown field 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, SSS1, Ramsay 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	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 common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the	N

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											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. 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.								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 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

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																		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. 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 capacity of the highway network in and around Castle Point, Evidence of	

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																		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. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD2	
0913 - 0001	Individual	Marilyn	Smale	RESIDENT	Yes	HAD4	Yes		Yes	Consistent with national policy		Traffic in Scrub Lane is increasing and between 7.30am to 9.00am	No	Not Answered	Not Answered		Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe	N

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												and 4pm to 6pm is heavy leading to congestion and tail backs approaching Rectory Road. Scrub Lane is now used as a cut through to avoid the A13 through Hadleigh. The addition of 114 New Homes on this site will lead to more traffic congestion and residents parking in Scrub Lane will further restrict the flow of traffic.					capacity on Scrub Lane 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.		
0125 - 0001	Individual	Daniel	Smart		Yes	SP3	No	Dear Sir/Madam , I DO NOT support the Castle Point Plan Regulation	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	PROPOSED MODIFICATION: Add North West	Not Stated		No		Housing target for Castle Point not met. The site selection ignores	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS

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								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.			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.	Thundersley site.					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	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.	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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																	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.		
0125 - 0002	Individual	Daniel	Smart		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
0004 - 0001	Individual	Pauline	Smith		Yes	SP3	Not Stated	I have just read that you are	Not	Not Stated			Not Stated		No		Objection to further housing	Noted	N

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								proposing a further 3000 homes on Canvey I would like to express my strongest opposition to to any further development we are already overloaded the roads are congested at all times of the day ,God help us if there was a Major incident	Stated								development in Canvey		
0093 - 0001	Individual	Marilyn	Smith		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	No		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 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	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	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.	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

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								land supply.			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.	, 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 considere	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.	regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	d 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		

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																	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.		
0093 - 0002	Individual	Marilyn	Smith		Yes	C4	No	The proposed number of Canvey West homes puts residents to 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
0116 - 0001	Individual	Olive	Smith		Yes	SP3	No	Dear Sir/Madam , I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO	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.	No		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against	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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to

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								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.			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.						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	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.	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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																	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.		
0116 - 0002	Individual	Olive r	Smith		Yes	C4	No	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
0123 - 0001	Individual	Victoria	Smith		Yes	SP3	No	Dear Sir/Madam , I DO NOT support the Castle	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.	PROPOSE D MODIFICATION: Add North	Not Stated		No		Housing target for Castle Point not met. The site	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA	Y - Policy SD3(3) 3. Proposals must demonstrat

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								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.			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.	West Thundersley 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	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.	e 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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																	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.		
0123 - 0002	Individual	Victoria	Smith		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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0268 - 0001	Organisation	Michelle	Smith	The Warehouse Bar	Yes	B8	No	I am a local business on the Manor Trading Estate and have had a presence on the estate for years. 1st I record that I have had the opportunity to read and fully understand my neighbour "G&K Groundworks Ltd" Unsound submission. For clarity I attach a copy of G&Ks submission to this e-mail. I record here that The Warehouse Bar agree with G&K Groundworks Ltd.'s that the regulation 19 draft as presented is	No	Not Stated	Again, I have not been consulted at all this is very worrying and concerning. I am certainly more confused now! Where am I going to be rehomed? This Regulation 19 along with the recent green belt review indicates that the area North where we are moving to has been identified as GB16 and has been discounted as it is not a viable! Option. I would like to record my total disbelief that CPBC along with our local councillors think it's OK to treat us the MTE business community with total disrespect. Suffice – I record again that this draft plan is unsound as it has not engaged with the business on the MTE at all. Albeit we are the drivers of the local economy. Perhaps CPBC might remove that Regeneration Priority Frightening Statement and actually support the local business. Please ensure that this unsound submission is recorded and registered correctly.		No	Not Stated	Yes, attached is G&K Groundworks Ltd's response to the consultation		The regulation 19 draft as presented is Unsound. CPBC have never engaged with the business community on this estate. Have never informed as is on the council's regeneration web page at priority No 4 that CPBC intends to build houses on the Manor Trading Estate and move all the businesses on the MTE North of the Borough I presume CPBC intends to compulsorily purchase	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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								Unsound. For the record and as relayed in G&K Groundworks Ltd submission • CPBC have never engaged with me / my business about our future on this estate. • Have never informed as is on the council's regeneration web page at priority No 4 that CPBC intends to build houses on the Manor Trading Estate and move all the businesses on the MTE North of the Borough • I presume CPBC intends to compulsor									my operational property! Again, I have not been consulted at all this is very worrying and concerning.		

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								ily purchase my operational property!											
0334 - 0001	Organisation	Glen n	Smith	ACT Road ways ltd		B8	No	This submission is by and on behalf of A.C.T Roadways Ltd who are the title owners of HMLR EX590021 which encompasses the whole of the Private Road & Path network on the Manor Trading Estate. Benfleet Essex. Significantly The Manor Trading Estate (MTE) is the only significant industrial / commercial space within Benfleet, it is the 2nd biggest designated	No		There are many significant anomalies surrounding the plan and or information relayed in the reg 19 document and the meeting notes. I highlight below just some those anomalies 1. Castle Point have a business forum it located via this link Castle Point Business Forum CastlePoint The attached snapshots are from the Business Forum & Bussiness Support & regeneration page drawn down 23/09/25 @13.56 Hrs Castle Point Business Forum The Castle Point Business Forum is currently inactive. However, we are looking to relaunch this forum in 2024. If you would like to become a part of this forum shaping its new direction, please email us at business@castlepoint.gov.uk • So much for engaging with business. The dates above indicate that last available date the forum was available would have been at best 31st Dec 2023. How long have the officers been developing this plan? Business Support and Regeneration Our Economic Development and Regeneration Team is responsible for developing and delivering business support and regeneration projects to support improvements within the Borough that help to make the				Yes - see attachment	B - see 0334 - 003	<u>Manor Trading Estate</u> Object to both the policy (particularly perception of partail replavement with residential) and the level of engagement to inform it.	<u>Manor Trading Estate</u> Noted Manor Trading 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'	N

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								employment area in within Castle Point. When I suggest 2nd that excludes CPBC themselves. They have a significant workforce that is financially support by the business rates collected from the business throughout castle point, of which 50% is retained by CPBC! We consider the Castle Point Plan Regulation 19 Draft is NOT compliant, is therefore Unsound, legally or otherwise. CPBC have numerous documents which			area a better place to live and work. • CPBC have a team? Perhaps had they made contact whilst this plan was in process they might have truly reflected the opinions of the business community. Further significant anomalies – indicate a complete and utter disregard and misrepresentation to all residents and the local business community								

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								clearly indicate they have misled the residents of Castle Point! They have informed all in Castle Point that they have engaged with the business that drive and invest in the local economy providing much needed new business premises and local employment opportunities. This Regulation 19 document has relayed to the residents of Castle Point that we the business's in Castle Point agree with the plan! Further											

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								that not only do we agree with it. CPBC have significantly informed everyone that we were involved in its development! That we also relayed our views to them, and that the officers and councillors alike at Castle Point took our views and opinions on board, which culminated in this draft local plan. That is totally NOT TRUE perhaps same officers & councillors might produce those supporting documents?											

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								As with all local plans the driver behind a local plan is the economy. The economy is driven by investment , 95% of investment comes from private business. Unlike most local authorities CPBC do not appear to have an adopted Regeneration & Economic Growth Strategy. Although CPBC do have a dedicated councillor who holds and has held the post / title of “Cabinet Member” recently re-titled “Portfolio Holder” responsible for Yes											

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								you guessed it “Regeneration & Economic Growth” since 2023. As previously stated, it is FACT not hearsay that I / We the private Road network owner at the MTE have never ever had a conversation, an email from that individual, Nor CPBC supposed regeneration team. Nor any officer who may have been involved in the drafting this unsound plan. Although I did email the cabinet member responsible for Regenerati											

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								on & Economic Growth along with other committee member a concise document prior the committee meeting which identified the many anomalies contained in the draft. Which not unsurprisingly he along with other committee members totally ignored. The culmination of that meeting was a unanimous vote for this regulation 19 public consultation. For the Avoidance of doubt that same information was relayed to 2 other											

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								councillors on that 7-person committee who happened to be 2 of the 3 MTE's Ward Councillors. None had the decency to reply let alone acknowledge the serious concerns relayed to them. So much for engaging with local business It is fact that no Officer, Councillor nor the specialist outside business consultant engaged by CPBC "Deyton Bell, have never ever engaged with A.C.T Roadways Ltd. The following is taken from CPBC											

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								website! Castle Point Council has partnered with Deyton Bell Ltd to deliver a fully funded business support program under the UK Shared Prosperity Fund (UKSPF), which is designed to support entrepreneurs and existing businesses within the Castle Point borough Suffice any new plan is supposedly supported by auditable evidence. Perhaps CPBC might locate all and every business engagement Q&A											

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								they received.											
0334 - 0002	Organisation	Glen	Smith	ACT Roadways Ltd		E1	No	Key priorities: Employment, Innovation and Economic Development • Canvey Seafront - to attract commercial investment and enhance the seafront appearance/facilities, creating more jobs for local people and improving the leisure and	No		Further anomalies. CPBC have made some significant errors in this envisaged plan which contradict its own documents. 1st They suggest that the MTE is 14.5 Hectare its only 12.5 at best. That's fact 2nd They indicate in one document that the West Side of the MTE commercial properties (circa 3.4 Ha - 25% of the estate) is to go being replaced with 200 residential units. One presumes they are using a multiplier of 50 to 55 per Ha, based on that density they will be Apartments and not houses with gardens and amenity space. 3rd Where might those new residents work! 4th CPBC then totally contradict themselves. They have produced another document that indicates the whole of the manor trading estate is to be replaced with housing. Not just				Yes - see attachment	B - see 0334 - 003	Concern for the businesses currently operating within the borough and where they will go due to the proposed mixed use sites allocated.	Noted Manor Trading 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'	N

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								recreational opportunities for local people and visitors. - Northwick Road - Canvey - To attract investment into the area and create high quality jobs for local people. - Charfleets Industrial Estate - Canvey - To improve access on to the estate and extend the estate. - Manor Trading Estate, Benfleet - Redevelopment of the trading estate for residential purposes and the relocation of the existing uses to a new site in the north			the western side! BUT significantly they still suggest only 200 residential units. Simple calculation if we reflect that CPBC officers say the MTE is 14.5 Ha that's a density of 13.7 residential units per hectare not very good return for decimating the local economy. Perhaps the idea is to attract new residents to the area that are wealthy. Perhaps the aim is to develop mini mansions with a buying price of circa £1.5M. they would be considered truly affordable for the local community. 5th No one has informed anyone on the trading estate where we are going to be rehoused. 6th It appears that CPBC think it's OK to dictate that all the business's on the MTE, should up sticks & move to Canvey which is neither accessible nor affordable. This is the same Canvey that has one single carriageway in & out that has significant traffic congestion daily. 7th The effect this plan will have on the local economy will be devastating to existing business's or anyone who might want to invest in a local business. This plan will drive business away from Castle Point to a more supportive local council. Fact Basildon, Rochford Southend & Thurrock support local business and encourage new business. 8th For CPBC to even suggest that they will be decimating the local business perhaps they might put a figure on the purchase of the Private Road								

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								of the Borough. • Opps the 4th priority, says, the MTE will be redeveloped for new housing! • With us the businesses on the MTE relocating to the North! • The site they suggest as “North” is commonly referred to by CPBC as GB16! • Discussions & public meetings during Aug & Sept 24 this GB16 parcel was the obvious answer to economic regeneration in terms of business expansion, & investment along with significant new circa			Network. In doing so take on the legal responsibilities that come with the deeds of grants and covenants that go with the title. 9th Suffice any plan to redevelop the MTE will come at a premium. A.C.T Roadways Ltd do not consider the Castle Point Plan Regulation 19 Draft to be Sound. It fails the tests of soundness on the business front alone. Again, business is the life blood of any local plan. CPBC officers have not engaged with the 120 businesses on MTE. I have engaged with them. Suffice the great majority have not only engaged with me & A.C.T they have more importantly willingly contributed significant sums of money which has allowed us as a business community to execute significant improvements to the estate. those improvements have had a desired effect! significantly the aim is over the next 5 years by 2030 have an estate fund that expends Circa £550,000.00 that is and will continue to contribute to the local economy as well as bring forward new investment. That’s true regeneration. Point to Note even as at today many on the estate are still not aware of Castle Point Councils intentions regards this estate. This draft local plan is not evidence based which is considered a very basic requirement of any local plan. I am confident that albeit the residents not the businesses of CPBC might allow this to go forward the inspector on reviewing & after due diligence								

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								5000+ affordable housing under grey belt scenarios. • Using the GB16 parcel would have delivered significant infrastructure investment & improvements to the local road network. It would have relieved severe congestion into and around Benfleet particularly at Sadlers Farm, The Tarpots and the local residential Church Road neighbourhood. Whilst doing so the GB16 parcel would have			will find this plan unsound thus reject it That rejection will come at an enormous cost to us the taxpayers of Castle Point. Officers & councillors for some reason have relayed / conveyed a figure of £1.7M. against the cost of developing a compliant plan, quite why they relayed that figure I'm not sure, perhaps they thought the resident would be swayed to say yes!								

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								allowed all residents in residential areas of Thundersley Old or new to be able to access the local housing road networks without using the 3 severely congested area noted above. • CPBC after putting this local plan forward for public consultation in July 25, produced a green belt review in August, which justified why that GB16 plot was not a viable option to include in the Local plan. One wonders why this wasn't produced and											

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								presented prior to the committee voting unanimously to take this to public consultation. • Yet at this day whilst writing this objection 23rd Sept 2025 the same council still informs anyone who might consider investing in new business, or indeed anyone already here investing in improvements Should not bother! Why would anyone invest in a business new or old where the local council says its being demolishe											

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								d and replaced by housing. • Who will be funding the business move, who will value a redundant property value, who will support the enormous cost of moving the business's • Where might the Businesses on the MTE be relocate too.											
0334 - 0003	Organisation	Glen	Smith	ACT Roadways Ltd		Foreword	No		No		For clarity A.C.T Roadways Ltd unsound submission related to the correct version of the Local Plan. A.C.T Roadways Ltd have since & after the event noticed other significant documents which were neither available to the committee on 23rd July 2025 when the Reg 19 was unanimously voted through! Nor publicly available / displayed or notified to the residents and or businesses of Castle Point. Those documents were both produced in August 25. They are:- attached to this email with a synopsis and reasoning below. 1. The housing capacity Topic				Yes - see attachment	None	State that significant documents which were neither available to the committee on 23rd July 2025 when the Reg 19 was unanimously voted through! Nor publicly available /	Noted	N

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											Paper of August 2025 2. CPBC Statement of Common Ground Castle Point Plan 2026 to 2043 Regulation 19 Pre-Submission Draft Re Land East of Manor Trading Estate, Benfleet Between Castle Point Borough Council and Essex County Council Of August 25 Further and of significance Re The housing Capacity Topic Paper of August 2025. Meta Data indicates that this PDF was converted on 15th August 2025. 23 days after the committee voted on 23rd July & 14 days after the Reg 19 consultation commenced. Conclusion This was not available to either councillors or the public. Re the statement of common ground, is entitled “Regulation 19 Pre-Submission Draft” it is clearly not a document that was produced pre the Reg 19 approval! The Reg 19 consultation closed on 26th Sept 2025, this document was not only not available it was not produced until the earliest in August 2025 – albeit it has no meta data that identifies the true date of the agreement, it transpires the PDF was created 30/09/2025 but regardless of when it was first discussed or a topic on conversation it was not agreed until 29th September 3 days after the closing date of the regulation 19 consultation.						displayed or notified to the residents and or businesses of Castle Point. Those documents were both produced in August 25. They are:- attached to this email with a synopsis and reasoning below. 1. The housing capacity Topic Paper of August 2025 2. CPBC Statement of Common Ground Castle Point Plan 2026 to 2043 Regulation 19 Pre-Submission Draft Re Land East of		

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																	Manor Trading Estate, Benfleet Between Castle Point Borough Council and Essex County Council Of August 25 Further and of significance Re The housing Capacity Topic Paper of August 2025. Meta Data indicates that this PDF was converted on 15th August 2025. 23 days after the committee voted on 23rd July & 14 days after the Reg 19 consultation commenced. Conclusion This was		

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0340 - 0001	Individual	Warren	Smith	G&K Groundworks		B8		This submission is by and on behalf of G & K Groundworks Ltd, we consider the Castle Point Plan Regulation 19 Draft is NOT compliant, is therefore Unsound and should not be taken forward nor presented to the inspectorate as indications are it will fail the test of soundness. Which will lead to significant delays in producing a new compliant plan whilst doing so cost an excessive sum, especially when one accounts this	No	Not Stated	G&K Groundworks Ltd who are a significant landlord on the MTE do not consider the CPBC's Regulation 19 Draft to be Sound. Quite simply this draft Local Plan has already put a question mark over the future of any business be they existing ones that have been here for years or any new venture that might have considered bringing new business and employment to Castle Point & Specifically Benfleet It quite simply fails the tests of soundness on the very basic failure to consult. You have not consulted with: - 1) The businesses on the MTE individually or collectively. Similarly, I have it on good authority that CPBC officers, councillor nor specialist business consultants have not engaged or consulted in any format with the owners of the private road & path network. I take this opportunity to advise that I am quite prepared to participate in any inspector examination. I am happy that my name will be published alongside my comments to the Castle Point Plan Regulation 19 consultation. Please acknowledge receipt of my submission.					B	<u>Manor Trading Estate</u> Object to both the policy (particularly perception of partail replavement with residential) and the level of engagement to inform it.	<u>Manor Trading Estate</u> Noted Manor Trading 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'	N

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								wasted expenditure, whilst at the same time leave business's in a position of doubt surrounding their future. Some Background G&K are the title owners of HMLR EX498233 the footprint is 1.22 ha just over 3 acre's which is except for connect packaging the largest single commercial / industrial premises on the Manor Trading Estate. Benfleet Essex. (MTE) G&K houses 28 tenants, albeit CPBC are											

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								fully aware of those tenants & business as this draft document clearly states CPBC have engaged with them all. For the avoidance of doubt and I engage with all my tenants on a at least a weekly basis not one of them has had any engagement with CPBC officers, councillors nor CPBC co-opted Deyton Bell. Fact this property has warehousing & storage buildings along with separate offices and external yards • 10 units											

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								have a warehouse footprint of 2400sq ft along with attached offices of 600 sq. ft and associated attached yards of 1200 sq. ft • 3 Units of 1200 sq. ft with 300 sq. ft office & 600 sq. ft of attached rear yard • It has 1 exceptionally large yard of over 20,000 sq. ft which is houses a significant 14 MW power station that feed the local grid. So, a significant contributor to the local economy. • It has 13 yards ranging from 1250 sq. ft to 5400 sq.ft. We are full											

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								to the brim. We continually must turn away enquiries for warehousing and offices. Aside from G&K Groundworks Ltd and its 28 tenants it appears from conversation with other business on the MTE they have not been engaged with. Yet this draft document along with the many website uploads. All indicate that our opinions are reflected in this draft plan. That is not true! Fact: Local plans should be evidence driven. Where											

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								might the records of the engagement with local business be! I believe that CPBC might have some difficulty in producing that evidence to the inspector if this ever gets to that milestone. Without auditable evidence the plan will fail. That said it will more than likely get through this stage, simply because 99% of the respondents to the consultation are a specific demographic who like those councillors are of a certain age and or											

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								demographic who gained their seats on a promise to protect the Green Belt. Significantly that results in them devastating the future the local business's that drive the local economy. There are significant other contradictory statement surrounding the draft plan. Which quite remarkably if taken in context indicate that CPBC its officers and councillors do not actually take the time even at this late stage to reflect on the true											

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								opinions of the local business's FOR INSTANCE, this is FACT same councillors who voted through this Reg 19 on 23rd July 25 were advised on 21st July, 2 days before they unanimously voted it through. Thus, were made fully aware of what was on the council's main regeneration page! They consciously ignored that information! They didn't even have the integrity intelligence to relay the same to the officers. That they might get that											

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								business destroying page removed. Below is an indication that our council are in complete disarray. The web page I refer is at this link Regeneration Priorities CastlePoint V.A.T. Reg No.690 8009 25 Registered Office: 376 London Road, Hadleigh, Essex. SS7 2DA Director: G.P. Smith Company Secretary: N.D. Smith Co.Reg No.3331126 Aside from G&K Groundworks Ltd and its 28 tenants it appears from conversation with											

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								other business on the MTE they have not been engaged with. Yet this draft document along with the many website uploads. All indicate that our opinions are reflected in this draft plan. That is not true! Fact: Local plans should be evidence driven. Where might the records of the engagement with local business be! I believe that CPBC might have some difficulty in producing that evidence to the inspector if this ever gets to that											

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								milestone. Without auditable evidence the plan will fail. That said it will more than likely get through this stage, simply because 99% of the respondents to the consultation are a specific demographic who like those councillors are of a certain age and or demographic who gained their seats on a promise to protect the Green Belt. Significantly that results in them devastating the future the local business's that drive the local economy.											

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								There are significant other contradictory statement surrounding the draft plan. Which quite remarkably if taken in context indicate that CPBC its officers and councillors do not actually take the time even at this late stage to reflect on the true opinions of the local business's FOR INSTANCE, this is FACT same councillors who voted through this Reg 19 on 23rd July 25 were advised on 21st July, 2 days before they unanimously voted it											

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								through. Thus, were made fully aware of what was on the council's main regeneration page! They consciously ignored that information! They didn't even have the integrity intelligence to relay the same to the officers. That they might get that business destroying page removed. Below is an indication that our council are in complete disarray. The web page I refer is at this link Regeneration Priorities CastlePoint											

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								It clearly says the 4th Regeneration priority is to redevelop the MTE to housing. It further informs we the business's will be moving North of the Borough. No matter how many times they have been notified of the above the last being in a submission of Yesterday 24th Sept 25 that same statement is on the web today. For the Avoidance of Doubt, I have at appendix 1 to this unsound notification letter taken a snapshot											

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								of that page which includes the date & time it was drawn down. Further indication that perhaps CPBC are in disarray, perhaps they thought we the business had been engaged with, albeit they never visited, be that by visiting & introducing themselves, by direct letter or email contact to each & every business which of course will be available as auditable evidence! It is possible that they think the engage											

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								nt was through CPBC’s web-based Business forum page. That link is here Castle Point Business Forum CastlePoint The snapshot below, is from today 25/09/25 at 16.27 Hrs. It is, as it was in July when I first informed councillors who voted the draft through! It is, as it was in August & Yesterday the 24th September ; Not Live, Not Operational & has not been operational since at the very latest Dec 2023! 1. There are other											

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								significant anomalies The same council officers and councillors have allowed to go unchecked 1. One document suggests only 25% (the western side of the MTE is to be used for housing. 2. Another indicates the whole of the MTE is to be used for housing 3. Remarkable both suggest 200 residential units! 4. One document suggest the MTE is 14.5 Hectares it isn't its 12.5. But significantly though CPBC based that											

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								officers and councillors have engaged with the whole of the Estate you would have thought one of them might have picked up that MTE is privately owned and that the commercial / industrial properties on the ECC highway known as Church Road are not nor have ever been part of the MTE. They are NOT. 5. Apparently as the regeneration priority Nr 4 we are still moving to the North of the borough! The only conclusion											

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								we come to is CPBC are still going to move us to that “North of the borough” location which CPBC identified as GB16 in the consultation process. YET This same council produced this Reg 19 document for committee in July in that document they discounted GB16. They appear to substantiate that rejection by producing an after the event Green Belt Review in August that relayed that GB16 was not supported											

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								by any Statutory Authority, I / we can only presume those consultees included: - Highways, NHS, Police, EA, Telecoms, Gas & Electric. Perhaps they have and will supply the inspector with that evidence.											
0340 - 0002	Individual	Warren	Smith	G&K Groundworks		Procedural matters		Re The housing Capacity Topic Paper of August 2025. Meta Data indicates that this PDF was converted on 15th August 2025. 23 days after								B	Procedural matters Re The Housing Capacity Topic Paper of August 2025. Meta Data indicates that this PDF was converted on 15th August	Noted	N

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								the committee voted on 23rd July & 14 days after the Reg 19 consultation commenced. Conclusion This was not available to either councillors or the public. Re the statement of common ground, is entitled "Regulation 19 Pre-Submission Draft" it is clearly not a document that was produced pre the Reg 19 approval! The Reg 19 consultation closed on 26th Sept 2025, this document was not									2025. 23 days after the committee voted on 23rd July & 14 days after the Reg 19 consultation commenced. Conclusion This was not available to either councillors or the public. Re the statement of common ground, is entitled "Regulation 19 Pre-Submission Draft" it is clearly not a document that was produced pre the Reg 19 approval! The Reg 19 consultation closed on 26th Sept		

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								only not available it was not produced until the earliest in August 2025 – albeit it has no meta data that identifies the true date of the agreement , it transpires the PDF was created 30/09/2025 but regardless of when it was first discussed or a topic on conversation it was not agreed until 29th September 3 days after the closing date of the regulation 19 consultation.									2025, this document was not only not available it was not produced until the earliest in August 2025 – albeit it has no meta data that identifies the true date of the agreement t, it transpires the PDF was created 30/09/2025 but regardless of when it was first discussed or a topic on conversation it was not agreed until 29th September 3 days after the closing date of the regulation		

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																	19 consultation.		
0427 - 0001	Individual	Susan	Smith		Yes	Had2	No	North Thundersley would be a much more viable proposition! The land for prospective development is too close to a natural heritage site, Roman Fort etc. The land around the Castle is unstable and could be seriously affected by close building works. Also drainage	No	Justified, consistent with national policy	I agree that Had2 policy is about protecting greenbelt / farmland and not suitable for development. But the plan for over 6000 homes puts the site at risk particularly our very important heritage site. What about nature conservation ecological restoration habitat creation? The salvation army purport to be there for the local community but are happy to sell land that will cause distress destruction of the above! Shame on them!!	Add North West Thundersley as a more viable solution where traffic can be easily controlled along the A127 (putting in a roundabout) and less congestion on A13 and minor routes.	No				Support for policy HAD2 but concern that the plan for over 6000 homes puts this site at risk for development and suggests north west thundersley should be considered.	Support noted. 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.	N

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								would be a problem! Added to which, the lack of suitable infrastructure such as congested roads, lack of doctors / dentists / schools - all over crowded and unable to cope already before thousands more houses are built in the area! Farmland is needed, despite what the S.A say, the soil is more than adequate to grow all kinds of crops (rather than importing from abroad!!) We must look after our heritage site - after all we are											

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								Castle Point!!											
0477 - 0001	Individual	Karen	Smith		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant ,	Support noted.	N
0647 - 0001	Individual	Fred die	Smith		Yes	SP3	No	The draft plan is not legally compliant because it does not apply the National Planning Policy Framework (NPPF) standard method to establish the borough's minimum housing requirement. Paragraph 62 of the NPPF stipulates that strategic policies must be informed by a local housing-	No	Effective, Justified, Consistent with national policy	The proposed plan exhibits significant shortcomings and does not align with the central government's objective of meeting the United Kingdom's housing needs. Current projections indicate that the plan will deliver only 53 percent of the required new homes. Development of the plan has cost taxpayers at least £1.6 million, following a warning notice from the Rt Hon Michael Gove MP in December 2023. Despite this expenditure, the draft does not employ the National Planning Policy Framework (NPPF) standard method for calculating housing need. Several allocations warrant reconsideration. For example, up to 3,143 homes are designated for the Canvey Urban Sites (Policies C1, C4, C9 and C10). The draft itself acknowledges that Canvey Island faces residual tidal-flood risk and is vulnerable to surface-water flooding because of its	To render the Castle Point Plan both legally compliant and sound, the council should incorporate the National Planning Policy Framework's standard method into Policy SP3, explicitly recognising a minimum requirement of 11,662 dwellings for the 2023-	No	Not Answered	Yes	A	Not meeting the Government's Standard Method figure. Flood Risk on Canvey. Third Road onto Canvey. North West Thundersley should be allocated.	Standard Method Housing Target 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. More information on this can be found in the Housing Topic Paper. 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	N

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								need assessment “conducted using the standard method in national planning practice guidance,” and, since the December 2024 revision, compliance with that method is mandatory . Nevertheless, the council’s Report to the Special Meeting of Cabinet (23 July 2025) acknowledges in paragraph 4.6 that the Castle Point Plan provides capacity for only up to 6,196 new urban-area homes by 2043, and concedes in			low-lying topography. More than half of the proposed new dwellings would be located in this area, raising questions about whether ground-floor levels can be deemed habitable. Furthermore, Canvey Island is served by only two access roads, and securing funding for a third has historically proved challenging. Alternative options identified by the council appear more compatible with national policy. Pages 46–53 of the Issues and Options Consultation (17 July 2024) demonstrate that “Option 3—North West Thundersley” could bring the borough much closer to meeting the NPPF housing requirement. This site is not subject to significant flood risk and lies adjacent to major transport corridors (the A127 and A130). Dame Rebecca Harris MP has previously observed that, should the council be required to allocate Green Belt land, North West Thundersley is the only site that merits consideration, being largely screened from the wider borough by Woodside Hill and Woodside Park. Much of the land is also likely to qualify as “grey belt” given its historical use. Despite these advantages, North West Thundersley is omitted from the current draft. While the council emphasises the importance of protecting the Green Belt, development tends to face local opposition wherever it is proposed.	2043 period. The plan must then allocate land with the capacity to deliver at least this number of homes by combining intensified use of suitable urban sites, targeted regeneration areas, and the selective release of Green Belt land where exceptional circumstances can be demonstrated. A sequential site-selection methodology—prioritising previously developed land, unconstra						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. 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	

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								paragraph 4.7 that this falls short of the Government's identified need of 11,662 dwellings. Moreover, the draft plan currently published for consultation states under Policy SP3 that just 5,100 homes will be delivered — contradicting the 6,196 figure cited in July 2025. These inconsistencies underscore the plan's failure to meet the mandatory housing requirement and its lack of clarity			Publishing a plan that meets only 53 percent of identified need, without allocating any Green Belt land—even where robust evidence supports doing so—raises concerns about the council's commitment to delivering the housing required across the borough.	ined non-Green-Belt sites, and, where justified, limited Green-Belt locations such as North West Thundersley, which benefits from strategic transport links and largely “grey-belt” characteristics—should be set out in the supporting text to show clear compliance with NPPF paragraph 148. Policy wording should be revised accordingly: SP3 would confirm 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 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	

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								regarding the true capacity for delivery.				11,662-dwelling requirement and commit to meeting it through the three-part land-supply strategy described above. Objective H1 should be updated to state the council's intention "to meet the full objectively assessed housing need of at least 11,662 dwellings by 2043, thereby supporting economic growth, local affordability, and community well-being." Finally, an annual Housing Delivery						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.	

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												and Land-Supply Position Statement must be published ; if delivery falls below 95 percent of the annualised requirement for two consecutive years, a partial plan review would be triggered within twelve months. Collectively, these changes align the plan with mandatory national policy, provide a demonstrable route to meeting housing need in full, and introduce a transparent mechanism							

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												m for on-going monitoring and early review.							
0801 - 0001	Individual	Peggy-Jane	Smith		Yes	SP3	No	My concern is that the government, will require more houses built.	No	Consistent with national policy	As before, I am concerned that the government will require more houses. Although I agree with the council that we have huge constraints within C.P. and I also agree that we should avoid building on greenbelt, I am concerned that certain greenbelt hasn't been fully accessed in the disastrous eventually we are forced to do so. (build on greenbelt). I think more attention should have been given to land North West Thundersley. This land will have the least overall impact on the majority of residents. It has a planned road infrastructure in place by E.CC. I think more work needs to be done to access its viability.		No	Not Answered	Not Answered	A	Not meeting standard method North West Thundersley	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	N

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																		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 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. 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	

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																		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.	
1002 - 0001	Agent	Nik	Smith	The Salvation Army c/o Nexus Planning	Yes	Foreword	No	The Regulation 19 consultation has not been undertaken properly, with two materially different versions of the Local Plan on the Council's website, and important documents added to the document library midway through the consultation period.	No	Positively prepared	Please refer to Appendix A for full details. Castle Point is not entitled to have taken the strategic approach that it has to the delivery of homes. The result is a Plan that advocates the delivery of around half of the homes that are actually needed (with reference to the Standard Method). The Council's justification for having taken this approach is not convincing and does not withstand scrutiny (for example, the suggestion that all Green Belt sites are unsustainable, when the Council's evidence base shows that GB8 is sustainably located). The Council will need to release Green Belt land for development to provide enough homes. The starting point in that process should be to release land that qualifies as 'Grey belt'. South of Hadleigh (GB8) is Grey Belt for the reasons described in these representations.	Please refer to Appendix A for full details. Consult on all documents, and one version of draft Local Plan. Include allocations (including GB) to meet Standard Method Need.	Yes	Not Answered	Yes	B - updated attachments	The Regulation 19 Plan is not sound. Its approach to the delivery of homes falls significantly short of the Framework's requirements and the strategic approach to the allocation of land towards meeting needs is not appropriate. The Castle	Consideration of All Sites All reasonable options were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). Procedural concern to be investigated.	Y - <u>Policy Had2 – Hadleigh Country Park, Hadleigh Farm and Benfleet and Southend Marshes</u> Minor modification (typographic error) 2. Proposals related to the development and/or use of the farm for agricultural and/or training purposes in line with the charitable mission of the landowner,

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											The Council's Sustainability Appraisal Annexes (July 2025) confirms that the site has good public transport links and accessibility (pg. 579), has good access to local services (pg. 630 and is well served by health services (pg. 745). Contrary to the evidence presented by the Council, there would be no heritage or landscape harms arising from the allocation of the site for development that could not be mitigated through detailed design. This mitigation is reflected in the Masterplan for the site, which shows how around 900 homes could come forward, alongside a new Employment Training Centre and Rare Breeds Farm. These proposals would help to deliver the Mission of the Salvation Army, through the delivery of high-quality new extension to Hadleigh that is respectful of its neighbours and contributes towards the local community. As currently prepared, the Castle Point Plan is not sound and it should be revisited, so as to include the allocation of land at Hadleigh.												Point Plan needs to release Green Belt land to help it meet identified housing need and the Plan has not been positively prepared. Promotes the Hadleigh Estate (site reference GB8) as available, suitable and achievable for development of a mix of uses, including approximately 900 new homes. The Council's assessment of this site is flawed and inaccurate and on proper analysis,		where they do not have a significant impact on the landscape or the Green Belt, and comply with the requirements of policy ENV4 and other relevant policies of this Plan; or	Paragraph 10.20 Also paragraph 10.20 of the supporting text says that 'it is therefore critical that any development allowed does not have an impact on the landscape'. Any scheme will have some level of impact on any landscape. This drafting should be revised to read 'any developmen

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																	the Plan's policies should allocate this site for a mix of uses, including residential. This would assist the Council in delivering a Plan that better reflects its need. Policy SP3 (Meeting Development Need). – Does not meet the standard method figure The release of this land GB8 for development would clearly represent a significant opportunity to further the work of the church		t allowed should not have a significant impact on the landscape'. That would reflect the language used in the main body of the Policy. <u>Policies Map errors</u> Hadleigh Estate • The location of the listed, and locally listed buildings are not accurate. • The key is not accurate for the Hadleigh Country Park, Hadleigh Farm, and Benfleet Southend Marches. Diagonal on the key but hatched on the plan.

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																	and charity in these important areas in Castle Point, and beyond, through providing enhanced community facilities as part of the masterplan, and through the generation of capital receipts. Further benefits would include substantial new and high-quality open space to be enjoyed by the existing communities around Hadleigh Farm and beyond, and substantial land made		Scheduled ancient monument key does not match the colour on the plan. Beige on key, and red on plan.

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																	available to provide biodiversity net-gains on a significant scale. A Vision Document and illustrative masterplan provided. the Council cannot currently demonstrate a Five Year Housing Land Supply. Questions evidence – Housing Topic Paper, SLAA and Heritage Impact Assessment. 5. Policy Had2 (Hadleigh Country Park, Hadleigh Farm and Benfleet & Southend Marshes. 5.1 For the		

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																	reasons described , we do not consider the draft Plan sound and do not support Policy Had2. We recognise that it broadly supports the provision of recreational, agricultural and training uses but it does not provide for much needed new homes at the site. 5.2 In addition, there is a typographic error or Part 2 of the Policy ('where they do not have a significant impact on the landscap		

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																	e [or] the Green belt], which we request is corrected. 5.3 Further, paragraph 10.20 of the supporting text says that 'it is therefore critical that any development allowed does not have an impact on the landscape'. Any scheme will have some level of impact on any landscape. This drafting should be revised to read 'any development allowed should not have a significant impact on the landscap		

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																	e'. That would reflect the language used in the main body of the Policy. 5.4 With regard the Draft Policies Map, we have the following additional observations: • The location of the listed, and locally listed buildings are not accurate. • The key is not accurate for the Hadleigh Country Park, Hadleigh Farm, and Benfleet Southend Marches. Diagonal on the key but hatched on the plan. •		

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																	Scheduled ancient monument key does not match the colour on the plan. Beige on key, and red on plan. Procedural concerns due to two versions of the draft plan being available on the website. Document entitled Regulation 19 Draft includes at Policy SP3 the plan will deliver 6,196 new homes over 17 years. The consultation response portal entitled 'Issues & Options Consultation Document – July-		

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																	September 2024 states that 5,100 new homes will be delivered over 20 years with a total of 3,595 homes within existing urban areas. This plan also says that grey belt sites in Canvey, Benfleet and Thundersley will be allocated for housing, although the capacity of those sites is left blank. Concerned that this will confuse respondents to the consultation especially in relation to the quantum		

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																	of developed and whether green/grey belt sites are proposed to be released. The Housing Capacity Topic Paper (August 2025) was introduced on the 15th August and noone was made aware of this addition despite it containing very pertinent information and concerned that not everyone is aware of it.		

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1002 - 0002	Agent	Nik	Smith	The Salvation Army c/o Nexus Planning	Yes	SP3	No	The Regulation 19 consultation has not been undertaken properly, with two materially different versions of the Local Plan on the Council's website, and important documents added to the document library midway through the consultation period.	No	Positively prepared	The requirements of the Framework with regard Plan making. 1.1 Paragraph 36 of the National Planning Policy Framework says that ‘plans are sound if they are...positively prepared, and provide a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs’. 1.2 Paragraph 62 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’. 1.3 The Council’s Housing Capacity Topic Paper (2025) recognises (at paragraph 3.5) that when applying the Standard Method as required by the Framework in arriving at an overall minimum housing need figure, the Castle Point Plan should seek to deliver 11,662 new homes over the Plan period (686 per annum x 17 years). The approach taken by the draft Plan. 1.4 The draft Castle Point Plan does not seek to deliver at least the minimum number of homes required, when utilising the Standard Method. Instead, it seeks to deliver 6,196 homes, entirely in existing ‘urban areas’ (i.e. on previously developed land). To achieve this figure, the Plan relies on a series of proposed allocations, existing commitments and windfall over the Plan period. 1.5 The Plan seeks to deliver just over half of Castle Point’s		Not Answered	Not Answered	Yes		Perceived under-delivery of housing.	<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.	N

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											objectively assessed need, with a shortfall of 5,466 homes over the plan period, or 321 per annum in each of the 17 years of the Plan. Such an approach does not meet the requirement to ‘positively prepare’ a Plan, and the draft Castle Point Plan is therefore unsound. 1.6 Given that the shortfall against objectively assessed need is so great, we have not forensically explored the availability, suitability or deliverability of the sites that the Plan does propose to allocate. Although, taking the example of the proposed Hadleigh Town Centre Broad Area (Had1), we have seen nothing in the Council’s Evidence Base to indicate there is sufficient available land within the town centre to deliver a minimum of 388 new homes, that a scheme can be brought forward of a suitable design in Hadleigh at the proposed 125dph, or that there is any capacity to lose existing town centre car parks. It seems likely that the total number of homes proposed by the draft Plan is likely to be found unrealistic under scrutiny. 1.7 The Housing Capacity Topic Paper identifies at paragraph 4.18 that the borough’s existing settlements cannot sustainably absorb 686 homes per annum (the need calculated with reference to the Standard Method) within urban areas. That being the case, the correct approach is to turn to land outside of the existing urban areas in Castle Point to ‘make up’ the substantial shortfall in								

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											supply against need. All land outside of existing boundaries of urban areas in Castle Point is designated as Green Belt. Consequentially, the Council will need to turn to releasing Green Belt land for new homes to meet the needs of its communities. 1.8 The Hadleigh Farm Estate (site reference GB8) has been mis-assessed in the Council's evidence base documents to the Plan and on proper analysis, and when seeking to meet the actual need for homes in Castle Point, should be allocated for development in the Plan.									

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1002 - 0003	Agent	Nik	Smith	The Salvation Army c/o Nexus Planning	Yes	SP3	No	The Regulation 19 consultation has not been undertaken properly, with two materially different versions of the Local Plan on the Council's website, and important documents added to the document library midway through the consultation period.	No	Positively prepared	SEE ATTACHMENT FOR TABLES AND FIGURES Housing Capacity Topic Paper (August 2025). 3.1 The Council's Housing Capacity Topic Paper (August 2025) 'sifts' Green Belt land within the Borough, first with reference to what it calls 'critical or strong constraints'. The land promoted for development at the Hadleigh Estate is not constrained by any of the factors considered in this assessment as is shown in the extract below. 3.2 As such, the site is identified by the Housing Capacity Topic Paper as being 'potentially unconstrained Green Belt', as reflected in the extract below (taken from pg. 33 of the document). 3.3 Paragraph 12.4 of the Housing Capacity Topic Paper confirms that transport analysis of the Green Belt sites promoted for allocation in the Plan (including this site, 'GB8'), as set presented at Regulation 18 stage did not identify problems with the transport network in accommodating these sites, other than in the case of northwest of Thundersley. This demonstrates that the development of 'GB8' can be accommodated within the highways network, subject to mitigation. 3.4 Whilst paragraph 12.12 of the Housing Capacity Topic Paper (August 2025) concludes that 'it is appropriate and in accordance with the NPPF to avoid development in the Green Belt [generally] as it would not be sustainably located and		Not Answered	Not Answered	Yes		Promoites site GB8	Noted	N

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											would impact on traffic capacity on the local highway network' that conclusion does not hold true in the case of the Hadleigh Estate, where elsewhere in the Council's evidence base the site is shown to be sustainably located and compatible with the capacity of the highways network, with 'high connectivity' (see Figure 1.1.4 above). We have explained the access strategy for the site in further detail below. The site Access Strategy. Walking and Cycling. 3.5 The site masterplan is being developed to ensure excellent pedestrian and cyclist connectivity to the local area, and to provide attractive walking and cycling routes through the development. To the north of the site there is footway provision on Chapel Lane and Castle Lane and both streets are residential in character, with street lighting and 30mph speed limits. These roads are also relatively lightly trafficked. Pedestrian and cycle access can be provided along these routes which provide convenient walking and cycling routes towards the local services and facilities within Hadleigh. 3.6 Connections for pedestrians and cyclists can also be provided onto the A13 (both via the site frontage and via Park Chase) and to the east of the site linking to Leigh-on-Sea as part of the proposed development. These accesses, in combination with new strategic walking and cycling routes across the site, will								

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											improve pedestrian and cycle access for both new and existing residents between Hadleigh and Leigh-on-Sea. 3.7 The existing Public Rights of Way (PROW) through the site can be retained and enhanced. Vehicular Access 3.8 Vehicular access can be achieved to the site from two new accesses onto the A13. The primary vehicle access into the site would be a three-arm roundabout located broadly in the centre of the site. To achieve this, the A13 would be realigned into the site immediately either side of the new roundabout and a service road would be provided to retain access to existing properties to the north. This has the benefit of minimising the impact of the access on the existing trees along the southern side of the A13 and the existing properties on the northern side of the road. 3.9 A secondary, smaller vehicle access would be provided at the eastern end of the site in the form of a ghost island priority junction (allowing vehicles to turn into the site from both directions, but only allowing vehicles to turn left out of the site). Fewer vehicles would use this access, and it would be intended to serve a small number of homes at the eastern end of the site. 3.10 It is proposed that these two new accesses with the A13 would be the primary vehicular accesses to the site, designed to serve the majority of the development. Two small parcels of new homes are then								

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											proposed to be accessed via Castle Lane and Chapel Lane. 3.11 Only pedestrians and cyclists would be able to route between the proposed A13 accesses and Castle Lane. This would ensure that a limited number of new houses would be accessed from Chapel Lane and Castle Lane so that these routes are retained as attractive walking and cycling routes. Promoting sustainable transport. 3.12 The UK Government has set out the impact of transport on carbon emissions and within the document 'Decarbonising Transport: A Greener, Better Britain' there are numerous commitments to encouraging modal shift to active travel modes to reduce carbon emissions. The land being promoted for development is ideally located to encourage walking, cycling and the use of public transport as opposed to the private car, to assist with reducing carbon emissions associated with transport. Local Services and Facilities. 3.13 Hadleigh High Street is within a 12-minute walk and a 4-minute cycle of the development and has a number of everyday services and facilities including supermarkets, shops, cafes, restaurants, takeaways, pubs, a pharmacy and hairdressers. Hadleigh Infant and Junior School is also within a 15-20-minute walk and a 6-7-minute cycle. The site is therefore ideally located to encourage travel by active modes, and								

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											there is good provision for pedestrians and cyclists which can be improved between the site and these destinations to encourage trips on foot and by bike. Public Transport. 3.14 The A13 is a key public transport corridor in the area and the bus stops along the A13 (which the site fronts) are served by very frequent services (every 5 minutes in both directions) providing links to key employment, shopping, education and leisure destinations. There is an opportunity to provide a mobility hub near the access and existing bus services on the A13 to facilitate the interchange between walking, cycling and public transport. The site therefore benefits from excellent access to bus services to encourage the use of public transport as opposed to the car. 3.15 Leigh-on-Sea Railway Station is located to the east of the site and provides connections to Southend-on-Sea to the east and Basildon and Tilbury to the west. The services to the west also provide access into London. New strategic walking and cycling routes across the site can provide access to Leigh-on-Sea Railway Station for new residents and also assist with improving access for existing residents in Hadleigh. 3.16 The site is therefore ideally located to encourage a shift to active travel modes and the use of public transport to reduce the reliance on the private car.								

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											Transport impact. 3.17 Any planning application for the site would be accompanied by a vision-led transport assessment that outlined and assessed the proposals in detail. This would include up-to-date background traffic survey data, details of all access proposals, forecasts for the walking, cycling, public transport and vehicle trips that the development could generate and a detailed assessment of the likely impacts on the A13 and other roads in the vicinity of the site. A sustainable travel plan would also be produced to identify a package of transport measures to encourage walking, cycling and public transport to and from the site. This will allow the local planning and highway authorities to assess the likely impact of the development on the local transport network. The Plan's approach to Green Belt sites. 3.18 The Hadleigh Estate (or 'South of Hadleigh / GB8) is noted at para. 13.10 of the Housing Capacity Statement as one of the 34 Green Belt sites 'identified for further consideration' for appraisal through the SLAA (discussed in detail below). Of these, the Topic Paper describes that 17 sites (part of 5 sites, and 12 'whole' sites) should 'continue to be considered further'. 3.19 The status in the context of Plan making of being 'considered further' is not clear. These 17 sites are not proposed allocations in the Regulation 19 Plan. It may be that the Council								

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											is anticipating scrutiny as to its proposed housing delivery at Examination stage and is holding these sites ‘in reserve’ in case they need to be relied upon. 3.20 In any event, South of Hadleigh’ (GB8) is not one of these 17 sites. The document indicates that this is because of conclusions reached in the Council’s Green Belt Assessment (2025), Landscape Sensitivity Assessment and Outline Landscape Appraisal – Part 2 (2024) and a bespoke Heritage Impact Assessment relating to GB8. 3.21 The findings of these documents in so far as they relate to South of Hadleigh are inaccurate for the reasons described in detail below. It is important that at para. 14.3 of the Topic Paper, the Council identifies that if the 17 sites that should ‘continue to be considered further’ were allocated for development, the Plan’s shortfall against the Standard method housing supply figure would be 1,664. The Masterplan scheme for this site shows around 900 new homes being delivered, which would clearly make a very important contribution towards Castle Point’s ability to meet its need, resulting in a shortfall of only around 700. 3.22 Whilst we cannot comment in detail of the suitability of these 17 sites that it appears may be brought into the Plan, we can comment on the appropriateness of bringing in this site and it is clear having								

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											reviewed the Council’s evidence base, and the expert advice of consultants supporting the promotion of this land, that this should happen. Green Belt Assessment (July 2025). 3.23 Firstly, GB8 should be regarded as Grey Belt in the terms of the NPPF. 3.24 The Glossary to the Framework 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 purposes (a), (b), or (d) in paragraph 143. ‘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’. 3.25 In order therefore to constitute ‘Grey belt’ the land at South of Hadleigh must not ‘strongly contribute’ towards the following Green Belt purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; d) to preserve the setting and special character of historic towns. 3.26 The Council’s Green Belt Assessment cross refers to the Castle Point Borough Green Belt Review part 1 (2018). That document has also been submitted as evidence in support of the Regulation 19 Plan. 3.27 The 2025 Assessment								

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											describes that the 2018 review ‘did not evaluate purpose d) (preserving historic settings) as it was not deemed applicable to the specific context of Castle Point’ (para.2.7.5). That remains the case, and so purpose d) of Para.143 of the Framework is not applicable to an assessment of whether South of Hadleigh should be regarded as Grey Belt. 3.28 The 2018 Review did however assess each [Green Belt] parcel [within Castle Point] individually ‘to determine its contribution’ to purpose a) and purpose b) (the remaining purposes relevant to an assessment of ‘Grey belt’). Paragraph 2.7.7 of the 2025 Assessment describes that the 2018 Review then ‘mapped out the cumulative contributions of each parcel...highlighting parcels with the highest overall significance to the Green Belt’ (noting that the only remaining purposes being considered are a), b) and c). 3.29 The result of this exercise was the preparation of a Plan to show ‘Locally Important Strategic Green Belt Areas’ (below). 3.30 It should be noted that the site at South of Hadleigh (Parcel 15) is not identified as one of these areas, indicating that it is not considered to ‘strongly contribute’ to either purpose a) or purpose b). 3.31 The 2025 Green Belt Assessment then goes on to ‘reassess’ land within the 2018 parcels against the relevant paragraph 143 purposes, with the parcel boundaries redefined								

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											so that they align with the site boundaries of Green Belt sites that have been promoted for including in the Plan and called ‘subareas’. The South of Hadleigh ‘subarea’ has the reference GB8 and its boundary is closely aligned with that of Parcel 15 of the 2018 Review. 3.32 The 2025 Assessment identifies that GB8 performs ‘moderately’ against purpose a) (to check the unrestricted sprawl of large built up areas). Whilst we do not agree with that assessment because we think that is an overstatement of the value of the land against that purpose, it is immaterial because if the subarea performs moderately as the Council says, it is not ‘strongly contributing’, which is the paragraph 143 Grey belt test. 3.33 That then only leaves purpose b). When considering purpose b) (preventing neighbouring towns merging into one another), the 2025 Assessment considers that GB8 performs strongly. That is in itself surprising, because the 2018 Review evidently dis not reach the same conclusion (because the parcel was not a ‘Locally Important Green Belt Area’) and it is not clear what might have changed between then and now. 3.34 Explanation for this finding is provided at page 65 of the Appendices to the 2025 Assessment, where it is stated that: ‘Development of the sub-area would lead to the coalescence between Hadleigh and Leigh-								

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											On-Sea in this location. Although it is accepted that these built-up areas already merge directly to the north of the sub-area and the A13, the sub-area forms a substantial part of the remaining gap between Hadleigh and Leigh-On-Sea, the development of which would result in the loss of visual separation between towns'. 3.35 The Council has, respectfully, misdirected itself with its analysis of 'the remaining gap' and visual separation between towns'. Purpose b) is simply 'to prevent neighbouring towns merging into one another'. 3.36 Hadleigh and Leigh and Sea are neighbouring towns that have long since merged into one another and so subarea GB8 makes no contribution to that purpose. The settlements have either merged or they have not merged – they cannot have 'partially' merged as the Council's analysis seems to indicate. In this case. The experience for anybody travelling along the A13 is that they pass between two towns through continuous urban development because the towns are merged together – there is no 'gap' between them. Even if that Council's approach to this assessment was correct, it cannot reasonably be the case that the site 'strongly contributes' to this purpose in these circumstances. 3.37 South of Hadleigh therefore does not contribute strongly to Paragraph 143 purposes a), b) or d). and it should be regarded								

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											as Grey Belt land. The Council should be treating this site like the 17 other sites that the Council refers in its Housing Capacity Study as for ‘further consideration’. That is particularly the case given that even if those 17 sites were allocated (and those sites in the current version of the Plan were robust in their ability to deliver the homes set out in the Plan period), there remains a large shortfall that the allocated of GB8 would significantly assist in addressing. Hadleigh Heritage Impact Assessment (June 2025). 3.38 The Council has commissioned a Heritage Impact Assessment relating to the site. This says that its analysis was based on the Vision Document for the site (at Appendix G) (as the Masterplan for the site had not been prepared at that time). Our Regulation 19 representations are supported by a Heritage Assessment of the site prepared by Cogent Heritage (Appendix E). 3.39 A summary table showing the respective positions on the potential level of ‘harm’ that could be caused to the various heritage assets at and around the site is set out in the table below. 3.40 There is some degree of difference between the Council’s Impact Assessment and that prepared by Cogent Heritage, but the differences are not very significant. These are likely to be explained for the most part by that the Council’s								

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											Report was based on the Vision Document (which has been significantly enhanced at Masterplan stage with regard the relationship with heritage assets) and that Place Services (who prepared the report for the Council) was not aware of the significant mitigation that is proposed as part of the Masterplan scheme, including substantial areas of landscape buffer planting. 3.41 In fact, the Masterplan scheme would cause no harm to designated heritage assets at or around the site, and low levels of harm to two non-designated assets within proximity of the site. Heritage should be regarded as no impediment to the allocation of this site for development, subject to appropriate design mitigation being secured. Drafting within a site allocation policy, or the Council's 'Development Management' policy relating to heritage would secure this at planning application stage. Landscape Sensitivity Assessment and Outline Landscape Appraisal (2024). 3.42 The Council's Landscape Sensitivity Assessment considers South of Hadleigh in two parcels. The eastern part of the site is referred to as 'GB8a' and the western part of the site is 'GB8b'. 3.43 Whilst the Assessment concludes that GB8b has a medium to low landscape sensitivity, it considers GB8a to have high landscape sensitivity. This is described as being because of views and the setting								

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											of Hadleigh Castle, existing vegetated field boundaries and open and long distance views across the estuary. 3.44 It is important to note that the authors of this Assessment will not have had sight of the Masterplan for the site, which has been developed in close collaboration with Aspect Landscape, as consultants to the project. A Landscape and Visual Technical Note is provided at Appendix D. 3.45 The Masterplan design has been carefully developed to include strategically positioned ‘viewing corridors’ (areas of open green space, providing views southwards through the site towards the Estuary). These, taken together with extensive landscape buffer planting, would mitigate any harmful landscape impacts associated with developing the site. 3.50 We consider that the scoring displayed in the SLAA is quite arbitrary and difficult to understand. Had the criteria been scored more appropriately and transparently, the overall score would have been much nearer to the ‘maximum’ score of 82. 3.51 The SLAA concludes that it is unknown whether the site is developable or suitable. It clearly is both. It is also noteworthy that the density range shown for the site (between 1907 and 3179 units) is far higher than has been achieved through a detailed Master planning process, where a quantum of around 900 homes is shown. It is not clear where								

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											those much higher figures have arisen from or whether they have informed the scoring given to the site.								
1002 - 0004	Agent	Nik	Smith	The Salvation Army c/o Nexus Planning	Yes	SP3	No	The Regulation 19 consultation has not been undertaken properly, with two materially different versions of the Local Plan on the Council's	No	Positively prepared	Castle Point is not entitled to have taken the strategic approach that it has to the delivery of homes. The result is a Plan that advocates the delivery of around half of the homes that are actually needed (with reference to the Standard Method). – The Council's justification for having taken this approach is not convincing and does not withstand scrutiny (for example, the suggestion that all Green Belt sites are unsustainable,		Not Answered	Not Answered	Yes		The Regulation 19 consultation has not been undertaken properly, with two materially different versions of the Local Plan on the	Consultation was re-started to address the procedural concern regarding two versions. <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	N

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								website, and important documents added to the document library midway through the consultation period.			when the Council’s evidence base shows that GB8 is sustainably located). –The Council will need to release Green Belt land for development to provide enough homes. –The starting point in that process should be to release land that qualifies as ‘Grey belt’. South of Hadleigh (GB8) is Grey Belt for the reasons described in these representations. –The Council’s Sustainability Appraisal Annexes (July 2025) confirms that the site has good public transport links and accessibility (pg. 579), has good access to local services (pg. 630 and is well served by health services (pg. 745). –Contrary to the evidence presented by the Council, there would be no heritage or landscape harms arising from the allocation of the site for development that could not be mitigated through detailed design. –This mitigation is reflected in the Masterplan for the site, which shows how around 900 homes could come forward, alongside a new Employment Training Centre and Rare Breeds Farm. –These proposals would help to deliver the Mission of the Salvation Army, through the delivery of high-quality new extension to Hadleigh that is respectful of its neighbours and contributes towards the local community. –As currently prepared, the Castle Point Plan is not sound and it should be revisited, so as						Council's website, and important documents added to the document library midway through the consultation period. Perceived under-delivery of housing. Argues Site GB8 should have been allocated.	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.	

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											to include the allocation of land at Hadleigh.								
1002 - 0005	Agent	Nik	Smith	The Salvation Army c/o Nexus Planning	Yes	Policies Map	No	The Regulation 19 consultation has not been undertaken properly, with two materially different versions of the Local Plan on the Council's website, and important documents added to the document library midway through the consultation period.	No	Positively prepared		5.4 With regard the Draft Policies Map, we have the following additional observations: -The location of the listed, and locally listed buildings are not accurate. -The key is not accurate for the Hadleigh Country Park, Hadleigh Farm, and Benfleet Southend Marches. Diagonal on the key but	Not Answered	Not Answered	Yes		Error in public consultation With regard the Draft Policies Map, we have the following additional observations: -The location of the listed, and locally listed buildings are not accurate. -The key is not accurate for the Hadleigh Country Park, Hadleigh Farm, and Benfleet	Acknowledged by the council and a second regulation 19 consultation was undertaken to address this issue. The data used for the policies map was sourced from Historic England and Essex County Council. A general review of the styling of the map has been added to the mods list.	N

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												hatched on the plan. –Scheduled ancient monument key does not match the colour on the plan. Beige on key, and red on plan.					Southend Marches. Diagonal on the key but hatched on the plan. –Scheduled ancient monument key does not match the colour on the plan. Beige on key, and red on plan.		
1002 - 0006	Agent	Nik	Smith	The Salvation Army c/o Nexus Planning	Yes	HAD2	No	The Regulation 19 consultation has not been undertaken properly, with two materially different versions of the Local Plan on the Council's website, and important documents added to the document library midway through	No	Positively prepared	5. 1 For the reasons described, we do not consider the draft Plan sound and do not support Policy Had2. We recognise that it broadly supports the provision of recreational, agricultural and training uses but it does not provide for much needed new homes at the site.	5.2 In addition, there is a typographic error or Part 2 of the Policy ('where they do not have a significant impact on the landscape [or] the Green belt'), which we request is corrected. 5.3 Further, paragraph 10.20 of the supportin	Not Answered	Not Answered	Yes		Broadly supports the premises of Policy HAD2 but does not support the lack of allowance for homes on this site. Highlights typo at paragraph 5.2 In addition, there is a typographic error or Part 2 of the Policy ('where they do	This site has not been allocated for residential development due to a number of constraints including Green Belt allocation, Environmental, Historical aspect. More information on this can be found in the evidence base documents, specifically the hadleigh heritage impact assessment and the housing capacity topic paper. See modifications to address typo highlighted.	10.2 It is therefore critical that any development allowed should not have a significant does not impact on the landscape. Furthermore, it is important that any recreational or farming activities are compatible with the nature conservatio

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								the consultation period.				g text says that 'it is therefore critical that any development allowed does not have an impact on the landscape'. Any scheme will have some level of impact on any landscape. This drafting should be revised to read 'any development allowed should not have a significant impact on the landscape'. That would reflect the language used in the main body of the Policy.					not have a significant impact on the landscape [or] the Green belt], which we request is corrected.		n status of the area.

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1071 - 0001	Individual	paul	smith		Yes	SP3	No	draft local plan is unsound due to only accounting for half of the housing required by the government. It needs to add the full amount of required housing and add the NW Thundersley site for this additional housing.	No	Consistent with national policy	draft local plan is unsound due to only accounting for half of the housing required by the government. It needs to add the full amount of required housing and add the NW Thundersley site for this additional housing.	draft local plan is unsound due to only accounting for half of the housing required by the government. It needs to add the full amount of required housing and add the NW Thundersley site for this additional housing.	No	Not Answered	Not Answered		Not meeting the housing target North West Thundersley	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 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	N

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																		but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. 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.	

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1273 - 0001	Individual	Anthony	Smith			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1273 - 0002	Individual	Anthony	Smith			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1273 - 0003	Individual	Anthony	Smith			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
0207 - 0001	Individual	Richard	Smitton		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	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	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound.	No		No		Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores	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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances,

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								West Thundersley and it has no credible five-year housing land supply.			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 NPF 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 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.	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 Manor Trading Industrial Estate site from the plan. Total housing target of 11,000. Note, I do not wish to participate at the oral examination.					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 flooding, SUDS measures are not appropriate for Canvey Island's unique	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.	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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																	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.		
0207 - 0002	Individual	Richard	Smitton		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

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0207 - 0003	Individual	Richard	Smitton		Yes	B8	No	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. 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. CBC vision is to create an environment that	Not Stated	Not Stated			No		No		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 commerci	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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								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 . CBC's Officers									al / 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		

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								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									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.		

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								estate, and there is no reasoned justification for using the Manor Trading Industrial estate for housing, with business integrated with residential homes.											
0371 - 0001	Individual	Roy	Soilleux		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 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	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	N

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											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, 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 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.								whole, to 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 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	

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																		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 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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																		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. 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	

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																		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. 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. Support for HAD2	

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																		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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0018 - 0001	Individual	Michael	Solkhoon		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	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	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	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. • 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	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 • 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. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery	N

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								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			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 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)	ities, 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. Essex County Council is investing in infrastructure and would be legally obliged to						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.	mechanisms. Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								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			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 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	cooperate . North West Thundersley offers a strategic opportunity for sustainable growth.							

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								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			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,								

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								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 constructiv			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. 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								

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								e 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			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, 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								

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								ire 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			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 demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous								

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								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			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 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,								

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								ng 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			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								

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								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.			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. 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								

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								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			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.								

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								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;											

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								they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											
0018 - 0002	Individual	Michael	Solkho		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	No				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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								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											

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								risks being found unsound on procedural grounds alone.											
0471 - 0001	Individual	Paul	Spagnol		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant ,	Support noted.	N
0472 - 0001	Individual	Josephine	Spagnol		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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0567 - 0001	Individual	Brenda	Spencer		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 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 procedure s	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 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	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.						Need for a third road to be included in the plan.	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 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.	

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																		Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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 capacity of the highway network in	

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																		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. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey,	

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																		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 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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0567 - 0002	Individual	Brenda	Spencer		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 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 has been identified through the Open	N

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																		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.	
0567 - 0003	Individual	Brenda	Spencer		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

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
0500 - 0001	Individual	Carol	Spicer		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 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 procedure s	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 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	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.						Need for a third road to be included in the plan.	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 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.	

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																		Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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 capacity of the highway network in	

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																		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. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey,	

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																		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 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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0500 - 0002	Individual	Carol	Spicer		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 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 has been identified through the Open		N

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																		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.	
0500 - 0003	Individual	Carol	Spicer		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

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
1145 - 0001	Individual	Robert	Spicer			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1145 - 0002	Individual	Robert	Spicer			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1145 - 0003	Individual	Robert	Spicer			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

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
1146 - 0001	Individual	Sheila	Spicer			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1146 - 0002	Individual	Sheila	Spicer			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									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
								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1146 - 0003	Individual	Sheila	Spicer			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
0104 - 0001	Individual	Alan	Spiller		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	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	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt	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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances,

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								West Thundersley and it has no credible five-year housing land supply.			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, 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	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.					, 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	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 have been considered through the SFRA.	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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											estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						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		

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																	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.		
0104 - 0002	Individual	Alan	Spiller		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

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
0813 - 0001	Individual	Alan	Spiller		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 "overdevelopment 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 suitor development, but this unsound plan for 6,200 homes puts the Hadleigh Farmland site at risk to speculative development, needing planning objections with respite urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of	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		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 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	N

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											infrastructure, protecting our farmland and 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 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.								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 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	

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																		option 4) outlines why North West Thundersley was not preferred. 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 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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																		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. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD3	

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0643 - 0001	Organisation	Robert	Spink	King John's Wood Landowners Consortium	Yes	SP3	No	The Draft LP does not comply with the LDS. It does not comply with the NPPF, particularly in identifying current GB land which is not meeting the GB functions and is previously developed . It does not provide the mandatory Standard number of dwellings. CPBC has not worked sufficiently collaboratively with neighbouring authorities .	No	Positively prepared, Effective, Justified, Consistent with national policy	It does not comply with the NPPF, particularly in identifying current GB land which is not meeting the GB functions and is previously developed and therefore could and should be released to provide much needed homes and to take a fairer share of the region's housing need. It does not provide the mandatory Standard number of dwellings. It fails to provide economic activity and the homes needed in the borough. It fails to set out the correct mix of dwellings, relying too much on flats.	The previous Lp which was found sound but not adopted by the council should be used as the basis for the new LP. This would assist in making the new LP sound.	Yes	Not Answered	Not Answered	A	Does not meet the standard method housing target Does not release any GreenBelt regardless of if it meets GreenBelt function tests or not Dwelling mix relies too heavily on flats	Standard Method Housing Target 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. More information on this can be found in the Housing Topic Paper. Green 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	N

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																		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. 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. Dwelling Mix An update to the Local Housing Needs Assessment, Gypsy and Traveller Accommodation Assessment and a Specialist and Supporting Housing	

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																		Assessment (prepared by Essex County Council) has informed policies within the Castle Point Plan to ensure a mix of housing types are delivered for our future residents. This includes ensuring the needs of our ageing population and those unable to afford to buy a home are met.	
0255 - 0001	Individual	Scott	Spinks		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	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		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.	Green Belt/Grey belt covered under policy GB2. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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	N

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								land supply.									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	Guide for Essex. Canvey SuDS options have been considered through the SFRA. North-West Thundersley 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. 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	

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																	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. Add NW Thundersley.	why North West Thundersley was not preferred.	
0255 - 0002	Individual	Scott	Spinks		Yes	C4	No	Canvey West homes puts	No	Not Stated			Not Stated		No		The number of Canvey West	Needs of emergency services considered in the supporting	N

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								residents in the East at risk with emergency evacuation procedures.									homes puts residents in the East at risk with emergency evacuation procedures	Infrastructure Delivery Plan (IDP).	
0522 - 0001	Individual	Glen da	Spoon er		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	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 towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west	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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											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 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.						homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	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 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		

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																		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. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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	

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																		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. 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. Emergency Evacuation The Councils detailed emergency	

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																		planning pages are here www.castlepoint.gov.uk/emergencyplanning/ 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 Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The	

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																		Local Transport Plans 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.	
0522 - 0002	Individual	Glenda	Spooner		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what makes 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	Thorney 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 commitments. Full details of the 480 existing commitment can be found within the housing	N

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																	the site environment for local residents	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 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.	

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0522 - 0003	Individual	Glen da	Spoon er		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
0700 - 0001	Individual	Mar kus	Spring er		Yes	INFRA 6	Yes		Yes		I wish to say that it is fantastic to see common sense being applied in telecommunications mast planning. I am all for increased connectivity, however the siting of masts needs to be carefully weighed up in evidence based decisions, especially when they are located near vulnerable residents, for example children or elderly people with disabilities [REDACTED Personal Information] interference with EMF's is a real problem. For too long, genuine concerns around safety have been ignored and it is wonderful to see a sensible and pragmatic approach being proposed.		Not Answered	Not Answered	Yes		Support for Policy INFRA6	Support noted.	N

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0170 - 0001	Individual	John	Spurgeon		Not Stated	Had4	Not Stated	I'm sending you this email in response to a leaflet that was put through my door last week. We have concerns over the amount of housing that is proposed in the above reference. In the last proposal we received it suggested in the region of 65 homes, and now it 114! One of our concerns will be the parking on the road, considering the development of Scrub Mews which allows parking in Scrub Lane despite them	Not Stated	Not Stated	Our other concern is Scrub lane is only a small road and can't cope with the traffic and parking at this present time, so considering there could be another 200 plus cars from this development and also the infrastructure for schools and doctors in high demand, how is all this going to be met!	A more reasonable amount of property's should be suggested as this is excessive ! As we have lived in Scrub Lane for over [REDACTED] since it was an unmade Lane, I'm not opposed to development, but this will spoil the area by making it over developed!	No		No		Concerns over the amount of housing that is proposed. Concerns with parking on the road, considering the development of Scrub Mews which allows parking in Scrub Lane despite them having off road parking, this causes many problems with traffic, and is dangerous to traffic coming out of Bilton Road! If this is allowed for this development it will be dangerous, as this	Parking provision covered under Policy T7 . Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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								having off road parking, this causes many problems with traffic, and is dangerous to traffic coming out of Bilton Road! If this is allowed for this development it will be dangerous, as this road is already used as a pick up for the school morning and afternoon!									road is already used as a pick up for the school morning and afternoon !. Further concern is Scrub lane is only a small road and can't cope with the traffic and parking at this present time, so considering there could be another 200 plus cars from this development and also the infrastructure for schools and doctors in high demand, how is all this going to be met!.		

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1012 - 0001	Agent	Arun	Sriskanda	Oikos Storage Ltd c/o Adams Hendry Consulting Ltd	Yes	C3	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	1. Oikos Storage Limited (Oikos) welcomes and supports the inclusion of a section in the presubmission Plan, which deals specifically with its site as a port facility and acknowledges its national significance. Oikos also welcomes the fact that, following the examination and subsequent receipt of the Inspector's Report into the 2022 version of the Local Plan, a significant number of alterations have been made to the policy and its supporting text. Unfortunately, however, Oikos considers that, as currently drafted, certain aspects of this section of the plan are still unsound, as explained below. Policy C3 2. The draft policy usefully outlines a series of criteria that future development proposals at the site will be assessed against. In general, this is a helpful approach, which should provide a level of certainty for Oikos in any proposals that it brings forward. Oikos considers, however, that the caveat within the introductory sentence of the policy - 'will normally be permitted' (emphasis added) - introduces ambiguity into the decision-making process and removes the certainty that the policy should be aiming to achieve. 3. The NPPF makes clear (paragraph (16(d))) that, amongst other things, Local Plans should contain policies that are clearly written and unambiguous so it is evident	Policy C3 needs to be redrafted to read something along the lines of the following: Within the allocated Port Related Facilities Area shown on the Policies Map, applications for development will be permitted, subject to the following criteria: a. The design of the proposed development must not cause significant harm to the landscape or environmental assets, having regard to	Yes	Not Answered	Yes	A	Oikos Storage Limited (Oikos) welcomes and supports the inclusion of a section in the presubmission Plan, which deals specifically with its site as a port facility and acknowledges its national significance. Oikos also welcomes the fact that, following the examination and subsequent receipt of the Inspector's Report into the 2022 version of the Local Plan, a significant	Policy C3: It is considered the policy is sufficiently supportive of Canvey Port Facilities. The word 'normally' acknowledges that there are standard planning considerations and criteria that need to be adhered to. The planning authority is obliged to consider the views of statutory consultees and other material considerations in the development management decision making process. C3(b). Paragraph 8.27 notes that '<i>The Calor Gas and Oikos terminals are nationally significant and have a role to play in ensuring the security of energy supplies in the UK</i>'. Their national interest role is therefore implicit C3(d) Agreed that the coastal path may not be relevant or proximate to every application, see modification to Policy C3(d) proposed to align with supporting text,	C3(d): Public access to the coastal path adjacent to the site must be protected and opportunities to enhance access for pedestrians, cyclists and equestrians will be sought where appropriate ;

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											how a decision maker should react to development proposals. As a result of the wording highlighted, it is Oikos' view that the draft policy is not positively prepared, and the effectiveness of its implementation is reduced. The wording should be amended to remove this uncertainty. A suggested alteration has been highlighted below. Policy C3 – Criterion b. 4. Criterion b. of the draft policy requires certain proposals to demonstrate that they are in the national interest. It is Oikos view that this criterion is unjustified and inconsistent with national policy. The NPPF indicates that such a policy consideration is only necessary in respect of major development in certain designated areas, for example, National Parks (NPPF paragraph 190). The Oikos facility is not located within such an area, but this criterion would require it to be demonstrated that the relevant proposals at the site were in the national interest, a potentially onerous requirement for which no justification has been provided. 5. The National Policy Statement for Ports (NPSfP) – a national policy statement to which the emerging plan has to have regard to in terms of port facilities and port development matters - similarly does not require it to be demonstrated that port development is in the national interest in order for it to be approved. Again, only	the scale of existing development on the site; c. There must be no unacceptable change in the level of hazard or risk posed by the facility as a consequence of the proposals. . The Health and Safety Executive must be consulted and their satisfaction sought in relation to this matter; d. Public access to the coastal path adjacent to the site must be protected, and opportunities to enhance access					number of alterations have been made to the policy and its supporting text. Unfortunately, however, Oikos considers that, as currently drafted, certain aspects of this section of the plan are still unsound, as explained below. Objects to Policy C3 intro paragraph wording caveat within the introductory sentence of the policy - 'will normally be permitted' (emphasis added), saying	C3(e): Given the environmental sensitivities, specific cross-reference is considered appropriate in this case.	

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											proposals in certain designated areas, or affecting certain designated areas in a particular way, are required to meet a such onerous policy test along these lines – circumstances which do not apply to the Oikos facility. In fact, the NPSfP makes it clear in the section providing guidance to the decision maker on the need for additional port capacity (section 3.5) that the need for future capacity should be accepted and that consequently there should be a presumption in favour of granting consent for port development infrastructure. Having regard to the Government’s proposed revisions to the NPSfP (published in June 2025) the national policy position on the need for port development is, in Oikos’ view, likely to further be strengthened. 6. The NPPF highlights that planning should encourage sustainable economic growth and create the conditions to build a strong, competitive economy in which businesses can invest, expand and adapt. Significant weight is to be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (paragraph 85). The imposition of onerous policy restrictions is particularly significant in respect of port facilities, which, as the NPSfP makes clear, operate in a market-led industry where competition between ports is	will be explored where they are appropriate and do not compromise the safety and security of the facilities or their operations						this introduces ambiguity into the decision-making process and removes the certainty that the policy should be aiming to achieve. Objects to Policy C3(b) requirement for the policy to be in the national interests, suggests this is contrray to the NPPF and The National Policy Statement for Ports (NPSfP) Objects to Policy C3(d) sating enhancements to access 'will' be		

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											encouraged (paragraphs 3.3.1 and 3.4.13). 7. The unsound nature of this criteria is further illustrated by the fact that a situation could arise where an application for an alteration to the facility includes a change of material handled that does not result in an unacceptable change in the level of hazard or risk and is acceptable to the Health and Safety Executive (and thereby meets other relevant criteria of the policy) but is able to be refused because it cannot be demonstrated to be in the national interest. 8. Finally, leaving aside the above, this suggested policy criterion is not effective. Having correctly recognised that the facilities being referred to are of national significance, it would seemingly be possible to argue that any development proposal put forward in connection with them would be in the national interest. For the reasons summarised above, criterion b. of draft policy C3 needs to be deleted. Policy C3 – Criterion d. 9. Oikos understands the importance of protecting public access along the coastal path that runs along the southern boundary of the facility. Criterion d. of the draft policy, however, extends further than protection and requires that opportunities to enhance access ‘will be’ sought.						sought. Taking a blanket approach to proposals in such a sensitive location is not considered to be justified or effective. Paragraph 8.30 of the reasoned justification appears to acknowledge the need for flexibility in this location and seeks to ‘explore’ such opportunities rather than imposing a definitive position. Unfortunately, however, this understanding has not been		

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											10. As noted within the reasoned justification text both the Oikos and Calor facilities are registered as Control of Major Accident Hazard (COMAH) sites due to the nature of the goods received and stored at the sites. Taking a blanket approach to proposals in such a sensitive location is not considered to be justified or effective. Paragraph 8.30 of the reasoned justification appears to acknowledge the need for flexibility in this location and seeks to ‘explore’ such opportunities rather than imposing a definitive position. Unfortunately, however, this understanding has not been reflected in the draft policy text. 11. Maintaining safety and security at the Oikos facility is paramount, and it is within this context that enhanced access must be considered. Proposed amendments to the policy wording regarding these matters are outlined below. Policy C3 – Criterion e. 12. The purpose of including this criterion is unclear and appears unnecessary. The starting point for the assessment of development proposals is the consideration of compliance against all policies within the Local Plan. The need to explicitly require compliance with two specific policies is, therefore, not apparent and results in a duplication that is unjustified. 13. Furthermore, stipulating instances where consideration							reflected in the draft policy.					Policy C3 (e) The purpose of including this criterion is unclear and appears unnecessary. The starting point for the assessment of development proposals is the consideration of compliance against all policies within the Local Plan. The need to explicitly require compliance with two specific policies is, therefore, not apparent		

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											is ‘especially’ relevant suggests that in other instances it is less so. Thus, reducing the clarity of the criterion and the policy’s effectiveness. Such a flexible approach to compliance is not replicated within Policies ENV3 and SD4, and as such, results in internal inconsistencies within the Local Plan. It is suggested that this criterion should be removed.						and results in a duplication that is unjustified.		
1012 - 0002	Agent	Arun	Sriskanda	Oikos Storage Ltd c/o Adams Hendry Consulting Ltd	Yes	C3	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	Paragraph 8.27 – Oikos would highlight that this paragraph only provides a partial description of the type of products which its facilities handle. Increasingly, as the nation transitions to net zero, the Oikos facility handles various sustainable fuel products.	Oikos also suggests that additional clarification is made to the supporting text at paragraph 8.27 as indicated in its comments above.	Yes	Not Answered	Yes	A	Paragraph 8.27 only provides a partial description of the type of products handled at this facility	It is aimed to provide a brief explanation and considered acceptable, however please see modification added to include "various sustainable fuel products".	8.27 There are two port facilities located adjacent to each other at south Canvey. These port facilities include the Calor Gas terminal located to the west of Thames

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																			Road for the importation and storage of liquefied petroleum gas and the Oikos terminal to the east of Haven Road, which receives and stores oil and a range of hydrocarbon products and various sustainable fuel products. Both terminals...
1012 - 0003	Agent	Arun	Sriskanda	Oikos Storage Ltd c/o Adams Hendry Consulting Ltd	Yes	C3	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	Paragraph 8.30 - Oikos acknowledges the need to take account of the requirement to improve flood defences adjacent to its site in the future, but the proposed way in which the presubmission Plan is seeking to do this is unsound. Regard should be had to Oikos' separate representation on policy SD1 in respect of the safeguarded area referred to in paragraph 8.30.		Yes	Not Answered	Yes	A	Objecting to the 19m buffer referred to at paragraph 8.30	This is addressed in more detail at the comments for SD1 at entry 1012-0005	N
1012 - 0004	Agent	Arun	Sriskanda	Oikos Storage Ltd c/o Adams Hendry Consulting Ltd	Yes	Policies Map	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	In addition to the above points, Oikos questions why the photograph in the draft plan that sits alongside the policy is an aerial image of a fuel refinery facility and not an image of either the Oikos facility or the Calor facility. The use of a refinery image is potentially misleading as to the type of activities which take place at	The policies map should be reviewed and amended as appropriate to make sure	Yes	Not Answered	Yes	A	In addition to the above points, Oikos questions why the photograph in the draft plan	Agree to replace the photo. Agree to amend the Policies Map to correct errors and readability concerns in response to Oikos comments.	Y -Change the photograph so it shows the Canvey facilities (Current one is wrong oil terminal) .

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											both the port facilities on Canvey Island. Oikos would highlight that in respect of its facility on Canvey Island the policies map is a little difficult to understand in terms of the various allocations and designations which have been drawn and may have a number of errors in terms of the boundaries shown. For example, the northern boundary of the 'Port Related Facilities' area does not appear to match the 'on the ground' boundary of those facilities. Another query is that the proposed green lung designation appears to have been extended across a part of the 'Port Related Facilities' area. Having regard to the fact that the policies map is the way in which a reader of the plan is able to identify the various areas referred to in the policies of the plan, it is important that the policies map itself is accurate to avoid future misunderstanding.	that it accurately reflects relevant boundaries and is made easier to understand.					that sits alongside the policy is an aerial image of a fuel refinery facility and not an image of either the Oikos facility or the Calor facility. The use of a refinery image is potentially misleading as to the type of activities which take place at both the port facilities on Canvey Island. Oikos would highlight that in respect of its facility on Canvey Island the policies map is a little difficult to understand in terms of the			Update northern boundary of the 'Port Related Facilities' area to match the 'on the ground' boundary of those facilities and to remove overlap with South Canvey Green Lung. Address styling issues where multiple layers are overlapping causing difficulty in readability.

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																	various allocations and designations which have been drawn and may have a number of errors in terms of the boundaries shown. For example, the northern boundary of the 'Port Related Facilities' area does not appear to match the 'on the ground' boundary of those facilities. Another query is that the proposed green lung designation appears to have been extended across a part of the 'Port Related		

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																	Facilities' area. Having regard to the fact that the policies map is the way in which a reader of the plan is able to identify the various areas referred to in the policies of the plan, it is important that the policies map itself is accurate to avoid future misunderstanding.		

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1012 - 0005	Agent	Arun	Sriskanda	Oikos Storage Ltd c/o Adams Hendry Consulting Ltd	Yes	SD1	Yes		No	Positively prepared, Justified, Consistent with national policy	20. Policy SD1 deals with, amongst other matters, the ability to protect and enhance the existing flood defences on Canvey Island. Criterion 4 of the policy sets the provision of a 19m buffer zone from the existing flood defences on Canvey Island, to ensure land is safeguarded for future flood defence works, landscaping, environmental enhancements and amenity. 21. As currently worded, the criterion does not take into account that the buffer extends through the operational Oikos facility – including areas containing critical operational infrastructure - and essentially sterilises that section of the site from future development. It is Oikos' view that this blanket approach does not acknowledge the different requirements of the land uses located along the coastline, and places undue restrictions on these land uses, including the operations of the nationally significant Oikos facility. Furthermore, it is not clear to Oikos what evidence the 19m distance is based upon or why it is necessary for a blanket safeguarding for landscaping, environmental enhancements and amenity measures in addition to flood defence works. 22. Oikos primary view is that such a blanket safeguarding is unnecessary because there already exists a process separate to the 'planning process' whereby development in close proximity to flood defence infrastructure has to be approved by the Environment	If it is considered necessary for Policy SD1 criterion 4 to be included, then this needs to be redrafted along the following lines A buffer up to 19m wide of land adjacent to the existing flood defence structure on Canvey Island, as shown on the Policies Map, is safeguarded to enable consideration to be given to the need for future flood defence works within the area. For any	Yes	Not Answered	Yes	A	Object to Policy SD1(4) provision of 19m buffer since the criterion does not take into account that the buffer extends through the operational Oikos facility – including areas containing critical operational infrastructure - and essentially sterilises that section of the site from future development. It is Oikos' view that this blanket approach does not acknowledge the different requireme	it is considered that Plan paragraphs 21.14 and 21.15 cover the need for early discussions with the Environment Agency at a very early stage in the event of formulating development proposals within the safeguarded sea defence area.	N

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											Agency through its flood risk activity environmental permitting process. It is an established principle that the planning process should not seek to duplicate controls that are already achieved through a separate process or regime. Rather the planning process is to simply assume that such separate regimes operate effectively. 23. If, however, such a policy is to be included in the local plan it is highlighted that the draft policy as worded does not reflect Oikos’ understanding of the discussions held during the previous Castle Point Borough Council Local Plan Examination. It is Oikos’ understanding that the position reached previously was that such a policy should indicate that the suitability of proposals within the 19m area will be considered on a case-by-case basis and that agreement on the acceptability or otherwise of a proposed development would be determined through the development management process as a result of consultation between the applicant and the Environment Agency (EA) as necessary. It is noted that the importance of early discussions with the EA regarding such works is emphasised within the reasoned justification for the policy (paragraph 21.15), which appears generally to suggest that the approach to be taken to development proposals within the suggested safeguarded zone is as Oikos understands from the previous discussions.	development proposals coming forward within the safeguarded zone the Council will consult with the Environment Agency to determine the extent of land required to be kept free from development.					nts of the land uses located along the coastline, and places undue restrictions on these land uses, including the operations of the nationally significant Oikos facility. f it is considered necessary for Policy SD1 criterion 4 to be included, then this needs to be redrafted along the following lines A buffer up to 19m wide of land adjacent to the existing flood defence structure on Canvey		

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											24. It is Oikos' position that there is no justification for an approach to future works to flood defences which is not positive towards and supportive of proposals that may need to come forward within this area of the facility. Such an approach is inconsistent with national policy that strongly advocates economic growth (NPPF paragraph 85) and the ability for ports to be able to expand and adapt to meet market demands (NPSfP paragraphs 3.3.1 & 3.4.13). If such a policy is to be included in the plan, then amended wording of the criterion, which seeks to add flexibility to the text and reflects the discussions that were undertaken as part of the Examination into the previous Local Plan, is set out below.						Island, as shown on the Policies Map, is safeguarded to enable consideration to be given to the need for future flood defence works within the area. For any development proposals coming forward within the safeguarded zone the Council will consult with the Environment Agency to determine the extent of land required to be kept free from development.		

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1012 - 0006	Agent	Arun	Sriskanda	Oikos Storage Ltd c/o Adams Hendry Consulting Ltd	Yes	C6	Yes		No	Effective, Justified	Whilst Oikos acknowledge that the policy has been amended to reflect the previous Local Plan Inspector's report regarding the removal of references to landscape and openness, it is considered that the policy still contains unnecessary duplication with policies SP1, ENV3 and ENV4 and, therefore, remains unjustified and ineffective. Policy C6 continues to protect the area for its ecological value; however, it is noted that the land is already safeguarded through its designation under Policy ENV4 as a Local Wildlife Site (LWS) and Potential Local Wildlife Site – which are the subject of a separate representation by Oikos. Similarly, the overarching protection of ecologically valuable sites, securing nature recovery, and the provision of Biodiversity Net Gain are outlined through Policy ENV3. Furthermore, the importance of green infrastructure and the value it provides in connecting ecological networks is addressed through policy SP1. On this basis, it is not clear why an additional policy is required to cover the same matters. It is Oikos' view, therefore, that for the purposes of clarity, this policy should be deleted.	Policy C6 should be deleted.	Yes	Not Answered	Yes	A	Policy C6 should be deleted. Duplication with policies SP1, ENV3 and ENV4 and, therefore, remains unjustified and ineffective.	Noted. Policy C6 is considered to have an important role to warrant retention.	N

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1012 - 0007	Agent	Arun	Sriskanda	Oikos Storage Ltd c/o Adams Hendry Consulting Ltd	Yes	ENV4	Yes		No	Effective, Justified	Oikos supports the position stated in the Castle Point Local Wildlife Sites (LWS) Review 2023 that confirms the additional land at Brick House Farm Marsh, which in previous versions of the Local Plan had been included within the Local Wildlife Site (LWS) area, was not of sufficient value to meet the selection criteria. As such, it has been redesignated as a Potential Local Wildlife Site (PoLWS)(Brick House Farm Marsh Extension). As the leaseholder of these sites, Oikos would be grateful to be advised of any future review of these sites. 30. Oikos welcomes the subsequent reduction in the extent of the LWS at Brick House Farm Marsh, noting the boundary has been reverted to the position outlined in 2012. Unfortunately, this position is not clearly shown on the policies map due to the quality of the image but also because of the overlap of the Green Lung designation covering the same area of land and making the boundary difficult to identify. Notwithstanding this and on the basis that what is shown on the policies map reflects the boundaries in the LWS Review document, Oikos would like to make the following further points. 31. Oikos notes that there would appear to be duplication within the first three criteria of the policy. All three refer to the conservation and enhancement of either existing or potential LWS and/or Local Geological	Oikos would politely request that criteria 1-3 within the policy are combined to remove duplication and criterion 4 is amended to provide clarity on the differing policy requirements for existing and potential Local Wildlife Sites.	Yes	Not Answered	Yes	A	Oikos request that criteria 1-3 within the policy are combined to remove duplication and criterion 4 is amended to provide clarity on the differing policy requirements for existing and potential Local Wildlife Sites. Request for criterion 4 is amended to provide clarity on the differing policy requirements for existing and potential Local Wildlife Sites.	Noted. Changes are not considered necessary. Criteria 4 has been amended, please see mods list.	N

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											Sites. Oikos consider that this duplication is unnecessary and ineffective, and the wording should be amended to provide clarity. 32. Furthermore, Oikos notes from the suggested wording of criterion 4 that there is no apparent difference in policy terms and the various requirements set out, between a site that is a LWS and a site which is a PoLWS. This is an unjustified approach, which in effect means the same level of policy protection is given to an existing LWS as to one that only has the potential to be an LWS. The policy should, however, clearly differentiate between existing and potential sites to reflect the difference in their ecological value.								
1012 - 0008	Agent	Arun	Sriskanda	Oikos Storage Ltd c/o Adams Hendry Consulting Ltd	Yes	ENV2	Yes		No	Effective	Oikos consider that the policy as currently drafted is ineffective and therefore unsound as it does not acknowledge the strategic importance of the port and other employment facilities located along the river. Any strategy that relates to the coastal and riverside areas of the borough should take due account of such land uses and should be worded appropriately. 35. Oikos notes the Council's intention to work with the EA, ECC, lead local flood authority, neighbouring authorities and the community to prepare the Strategy. Further to the point made above and Oikos' operational infrastructure being located both adjacent to and extending into the River Thames, Oikos would politely request	Oikos would politely request that the wording of the policy is amended to include appropriate references to the port and other employment facilities within the coastal and riverside area.	Yes	Not Answered	Yes	A	Oikos consider that the policy as currently drafted is ineffective and therefore unsound as it does not acknowledge the strategic importance of the port and other employment facilities located along the	The Plan should be read as a whole and Port Facilities are covered by Policy C3, for which the supporting text acknowledges that they ' <i>are nationally significant and have a role to play in ensuring the security of energy supplies in the UK.</i> ' Therefore, it is considered that there strategic importance is already recognised within the Plan. Policy element 1 sets out that the Strategy will involve relevant stakeholders.	N

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											that they are involved as appropriate in the drafting of the strategy.						river. Any strategy that relates to the coastal and riverside areas of the borough should take due account of such land uses and should be worded appropriately. Oikos notes the Council's intention to work with the EA, ECC, lead local flood authority, neighbouring authorities and the community to prepare the Strategy. Further to the point made above and Oikos' operational		

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																	infrastructure being located both adjacent to and extending into the River Thames, Oikos would politely request that they are involved as appropriate in the drafting of the strategy. Oikos would politely request that the wording of the policy is amended to include appropriate references to the port and other employment facilities within the coastal and riverside area.		

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1012 - 0009	Agent	Arun	Sriskanda	Oikos Storage Ltd c/o Adams Hendry Consulting Ltd	Yes	C5	Yes		Yes		Oikos welcomes the Council's aspirations to improve access to and around Canvey Island, but as highlighted in representations relating to the previous version of the Local Plan, such improvements are not required to enable the Oikos facility to continue to operate successfully or to accommodate any future potential development at the facility. They could, however, provide additional resilience benefits in respect of the ongoing operations of this nationally significant facility. Oikos would politely request that, along with the other stakeholders referred to in the plan, they are involved as appropriate in the production of the feasibility study.		Yes	Not Answered	Yes	A	Not required for the operation of the oikos facility and wants to be consulted as this develops	Comments noted	N
1012 - 0010	Agent	Arun	Sriskanda	Oikos Storage Ltd c/o Adams Hendry Consulting Ltd	Yes	Policies Map	Yes		Yes		Oikos welcome the inclusion of the HSE consultation zones associated with its facility, and that the zones appear to be accurate and reflect the latest position. It is noted, however, that due to the clarity of the plan, it is difficult to confirm this and to clearly interpret the extent of the designations both covering and in the vicinity of the Oikos facility. In addition, there appear to be certain errors in the boundaries that have been drawn – as explained further within Oikos' representation on draft policy C3. It is suggested that a higher quality plan is submitted in order for Oikos (and others) to confidently confirm this position and to understand the boundaries of the designations that affect the site.		Yes	Not Answered	Yes	A	Oikos welcome the inclusion of the HSE consultation zones associated with its facility, and that the zones appear to be accurate and reflect the latest position. It is noted, however, that due to the clarity of the plan,	Agree to amend the Policies Map to correct errors and readability concerns in response to Oikos comments.	Y - Amend and tidy the Policies Map in relation to Oikos comments

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																	it is difficult to confirm this and to clearly interpret the extent of the designations both covering and in the vicinity of the Oikos facility. In addition, there appear to be certain errors in the boundaries that have been drawn – as explained further within Oikos’ representation on draft policy C3. It is suggested that a higher quality plan is submitted in order for Oikos (and others) to confidentially confirm		

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																	this position and to understand the boundaries of the designations that affect the site.		
1012 - 0011	Agent	Arun	Sriskanda	Oikos Storage Ltd c/o Adams Hendry Consulting Ltd	Yes	E1	Yes		Yes		Oikos welcomes and supports the acknowledgement within the policy that the South Canvey Port Facilities are a strategic employment area for the Borough and that the facilities are key industrial assets (paragraph 14.27) which provide scope for economic growth through the energy sector (paragraph 14.9).		Yes	Not Answered	Yes	A	Oikos welcomes and supports the acknowledgement within the policy that the South Canvey Port Facilities are a strategic employment area for the Borough and that the facilities are key industrial assets (paragraph 14.27) which provide scope for economic growth through the energy sector	Support noted	N

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																	(paragraph 14.9).		
1012 - 0012	Agent	Arun	Sriskanda	Oikos Storage Ltd c/o Adams Hendry Consulting Ltd	Yes	SD6	Yes		Yes		Oikos welcome and supports the inclusion of criterion 3 within the Policy, which relates to the principle of the agent of change and requires development proposals adjacent to or in the vicinity of existing businesses to demonstrate that they will not prejudice the continuing operations of those existing businesses.		Yes	Not Answered	Yes	A	Oikos welcome and supports the inclusion of criterion 3 within the Policy, which relates to the principle of the agent of change and requires development proposals adjacent to or in the vicinity of existing businesses to demonstrate that they will not prejudice the continuing operations of those existing businesses.	Support noted	N

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0755 - 0001	Individual	Anthony	Stacey		Yes	SP3	No	How on earth can further overcrowding an already overcrowded island be legally compliant	No	Effective	The island is already overcrowded with insufficient routes on and off the Island. The building of this many additional homes is only going to exasperate matters further. Even building a second route off the Island will not compensate for the additional homes.	Remove all additional housing. This Island cannot cope with more housing.	No	Not Answered	Not Answered		Remove all Housing on Canvey	Comments noted.	N
1131 - 0001	Individual	Iris	Staley			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:	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					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	<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> All reasonable option sites were	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.				housing target of 11,000.					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	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> 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	

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																	Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led	to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1131 - 0002	Individual	Iris	Staley			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1131 - 0003	Individual	Iris	Staley			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
0206 - 0001	Individual	Simon	Stallwood		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	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	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound.	No		No		Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores	Green Belt/Grey belt covered under policy GB2. All reasonable options were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances,

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								West Thundersley and it has no credible five-year housing land supply.			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 NPF 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 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.	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 Manor Trading Industrial Estate site from the plan. Total housing target of 11,000. Note, I do not wish to participate at the oral examination.					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 flooding, SUDS measures are not appropriate for Canvey Island's unique	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. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement ' <i>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</i>	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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																	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 Charfleet s	<i>there is no reasonable prospect for the site to be used for these purposes'</i>	
0206 - 0002	Individual	Simon	Stallwood		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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								procedures.									evacuation procedures		
0206 - 0003	Individual	Simon	Stallwood		Yes	B8	No	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. 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. CBC	Not Stated	Not Stated			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. 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	Green Belt/Grey belt covered under policy GB2. All reasonable options 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 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	Y - Policy SD3(3) '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 Assessment (SFRA) and recommen

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								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									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. Object for	options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement ' <i>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'</i>	datations/advise from statutory bodies (including EA, Essex LLFA).'

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								noise complaints . CBC'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,									proposals for residential on Charfleets		

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								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.											
0723 - 0001	Individual	Susan	Staples		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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0769 - 0001	Individual	joan	Staples		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 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 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	N

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																		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. 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	

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																		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. 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	

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

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																		Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/	
1160 - 0001	Individual	Jean	Starbuck			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	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	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site,					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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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			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	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.					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	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 allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West	

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								land supply.									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	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.	
1160 - 0002	Individual	Jean	Starbuck			Hou5		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 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. 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
								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.											
1160 - 0003	Individual	Jean	Starbuck			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	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
																	residents living at East Canvey		
1312 - 0001	Individual	Vickey	Starkey			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
1312 - 0002	Individual	Vickey	Starkey			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	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	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	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

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												target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					appropriate for Canvey Island's unique geography and drainage infrastructure.	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 point onwards. For further information please see housing topic paper.	Strategic Flood Risk Assessment (SFRA).
																	North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic		

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																		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. 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	

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																		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. 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. Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to Canvey. SUDs Policy SD3 covers	

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																		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.	
1312 - 0003	Individual	Vicky	Starkey			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
0760 - 0001	Individual	James	Stephens		Yes	HAD3	Yes		No	Justified	I think the land is better used by the NHS than it would be with houses.	Remove this policy.	No	Not Answered	Not Answered		Objecting to HAD3 due to loss of	Policy HAD3 will only be supported if the NHS provides assurance that the	N

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																	NHS building	site is surplus to their requirements and services operating from the site can be provided elsewhere.	
0760 - 0002	Individual	James	Stephens		Yes	HAD4	Yes		Yes			None: I think this policy would be an improvement.	Not Answered	Not Answered			Support for HAD4	Support noted.	N
1347 - 0001	Individual	Marie	Stephenson			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
1347 - 0002	Individual	Mari e	Steph enson			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 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	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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																		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 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	

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																		why North West Thundersley was not preferred. 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 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	

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																		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. 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 design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1347 - 0003	Individual	Mari e	Steph enson			C4					The number of Canvey West homes puts residents in the East		No				Developm ent at West	The safety of all Castle Point residents is a priority	N

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											at risk with emergency evacuation procedures						Canvey will impact emergency evacuation procedures for those residents living at East Canvey	and has been considered within the Castle Point Plan	
0974 - 0001	Individual	Philip	Stepney		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant ,	Support noted.	N
0974 - 0002	Not Answered	Philip	Stepney		Not Answered	Whole Plan	Yes		Yes				Not Answered	Not Answered		A	Castle Point Plan is sound and legally compliant ,	Support noted.	N
0103 - 0001	Individual	Mary	Stevens		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	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	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	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	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	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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								land supply.			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,.	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.					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	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.	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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																	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		

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																	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.		
0103 - 0002	Individual	Mary	Stevens		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
0884 - 0001	Individual	Hanna	Stevens		Yes	SP3	Yes		No	Positively prepared, Justified	The support and infrastructure such as health services, education and childcare provision and other local and social services are insufficient in the borough to meet the needs of this additional number of new properties. The roads are also insufficient to provide safe access to this site. There needs	Infrastructure changes to be implemented and all of the services above improved	No	Not Answered	Not Answered		Lack of Infrastructure	Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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											to be significant investment in the local area prior to considering the expansion of housing. The local main hospital is already struggling to meet the demands of the population coming last as an acute Trust and voted worst large hospital in the country.	and expanded prior to any new build being considered within the Castle Point Borough.							
0977 - 0001	Individual	Nicola	Steven		Yes	SP3	No	Failed to consider other alternative sites like North West Thundersley. No creditable 5 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	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		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	N

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											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 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. 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.								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 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	

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																		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 point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in	

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																		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. 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	

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																		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. 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. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not	

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																		considered necessary as the land is safeguarded by policy HAD6	

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0980 - 0001	Individual	Daniel	Steven		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 wildlife, out of character, open space, heritage,	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		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 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	N

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											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. 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.							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 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	

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0981 - 0001	Individual	Megan	Steven		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, 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,		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 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	N

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0983 - 0001	Individual	Millie	Steven		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, 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, 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		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 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	N

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1417 - 0001	Individual	Sue	Stevens		Not Stated	SP3	Not Stated	Planning for Glebelands I strongly disagree with these									Objections concerning Glebelands. Highways	The plan doesn't allocate any Green Belt land for development.	N

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								plans going ahead. As if there is not enough cars on the road from Sadlers to tarpots .. To take away more Green Belt Land. All the lorries etc needed to build .Lots of burst water pipes from Sadlers to Tarpots they are always digging up the road either side for one reason or another. the whole area From sadlers farm round to Rusbottom There are 3 schools in rushbottom road . that is at a standstill when children are dropped off or picked up.									concerns and loss of Green Belt land.		

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								They have coaches taking the children swimming etc. It is bedlam now. As for exit into Claire road> Are they going to knock properties down then as I cannot see how else anything could be attached to Clare Road. This has not been thought out properly at all. I live [Redacted Personal Information] even that is solid with cars although we all have a drive . Now days people average 4 cars per house. As the children can not											

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								afford to buy . lets say there are 2 cars per household that's 330. More cars . This just can not happen if there was an emergency we wouldn't be able to get on to the A13.											
0196 - 0001	Individual	John	Steward		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	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	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

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
								housing land supply.			3,316+ urban homes for Canvey is not resident led.						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		Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	West homes puts residents in the East at risk with emergency evacuation procedures.		
0196 - 0002	Individual	John	Steward		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
1343 - 0001	Individual	Beryl	Stewart			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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1343 - 0002	Individual	Beryl	Stewart			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 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	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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																		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 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	

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																		why North West Thundersley was not preferred. 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 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	

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																		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. 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 design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1343 - 0003	Individual	Beryl	Stewart			C4					The number of Canvey West homes puts residents in the East		No				Development at West	The safety of all Castle Point residents is a priority	N

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											at risk with emergency evacuation procedures						Canvey will impact emergency evacuation procedures for those residents living at East Canvey	and has been considered within the Castle Point Plan	
0129 - 0001	Individual	Ian	Stewart Johnson		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".	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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																	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		Assessment (SFRA).

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																	procedures.		
0129 - 0002	Individual	Ian	Stewart Johnson		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
0128 - 0001	Individual	Charlie	Stocker		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	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	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 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

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								no credible five-year housing land supply.			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		Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	residents in the East at risk with emergency evacuation procedures.		
0128 - 0002	Individual	Charlie	Stocker		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

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	
0396 - 0001	Individual	John	Stodel		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 totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recretaional, nature recovery, biodiversity, agricultrual, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage sitem 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, 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					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 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	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.							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 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	

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																		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 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	

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																		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. 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 capacity of the highway network in and around Castle	

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																		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. 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/Age nt?	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
0303 - 0001	Individual	Nikki	Stoker		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		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	<u>Consideration of All Sites</u> All reasonable options 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> covered under policy GB2. <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.	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).

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
																	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+	<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. <u>Emergency Services</u> Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	

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																	urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		
0303 - 0002	Individual	Nikki	Stoker		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

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
0305 - 0001	Individual	Rita	Stoker		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		Doesn't meet the housing target for Castle Point. 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. No Greenbelt / Grey Belt sites added, specifically with the	<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> covered under policy GB2. <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.	N

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																	exclusion of North West Thundersley. Add North West Thundersley site. 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	<u>Emergency Services</u> Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	

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																	puts residents in the East at risk with emergency evacuation procedures.		
0305 - 0002	Individual	Rita	Stoker		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
0181 - 0001	Individual	Brian	Stone		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	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	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 predeter	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	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

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								consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			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.						mined 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.	ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	e 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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																	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.		
0181 - 0002	Individual	Brian	Stone		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
0481 - 0001	Individual	Brett	Stone		Yes	SP3	No	No building should be started on housing until adequate infrastructure for said	No	Positively Prepared, Justified	I don't think local need is that great. We will just help solve another areas problem, thus increasing our own over time.	Scrap it			All	A	No building should be started on housing until adequate infrastructure for said	<u>Housing Need</u> Approach to Housing Need set out the Housing Topic Paper. <u>Infrastructure</u> Infrastructure matters are covered by policies INFRA1-6 and the supporting	N

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								development has been completed ie new seage works, schools / collages, flood mitigation, doctor surgery, roads, parking. I do not think Canvey Island is suitable for any new developments until at least one more road on and off is completed . We also need to keep some areas untouched by developers for wildlife, the environment and peoples sanity and wellbeing.									development has been completed ie new seage works, schools / collages, flood mitigation , doctor surgery, roads, parking. I do not think Canvey Island is suitable for any new developments until at least one more road on and off is completed. We also need to keep some areas untouched by developers for wildlife, the environment and peoples sanity and wellbeing. I don't think local	Infrastructure Delivery Plan (IDP). <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA).	

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																	need is that great. We will just help solve another areas problem, thus increasing our own over time.		
0482 - 0001	Individual	Kim	Stone		Yes	SP3	No	Infrastructure - Canvey Island is a flood plain. The Flood Risk Area 3a is officially considered a Flood Plain in the sense required by LUC Planning and Environmental Policy. Much of Canvey lies nearly 2 metres below the daily high tide level of the Thames Estuary. Our drainage is inadequate. By building many more	No	Not Stated	Infrastructure and services totally inadequate	Needs to be scraped				A	Infrastructure - Canvey Island is a flood plain. The Flood Risk Area 3a is officially considered a Flood Plain in the sense required by LUC Planning and Environmental Policy. Much of Canvey lies nearly 2 metres below the daily high tide level of the Thames Estuary. Our drainage is inadequate. By	Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	N

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								homes the Island cannot sustain the parking, the roads, the jobs, the services ie)Doctors, Dentists, Schools. One more road access to and from the Island is needed. There is at present over 40,000 people living on the Island, with more housing comes more vehicles. There is already a job shortage, many youngsters failing to seek employment and you will be adding more. Our doctors and dental surgeries cannot									building many more homes the Island cannot sustain the parking, the roads, the jobs, the services ie)Doctors, Dentists, Schools. One more road access to and from the Island is needed. There is at present over 40,000 people living on the Island, with more housing comes more vehicles. There is already a job shortage, many youngsters failing to seek employment and you will		

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								cope with the volume of people at present. As all of the above states Canveys needs, unless the infrastrcutre is sorted the current plan is unsound and does not meet the required legal requirements and is unsafe.									be adding more. Our doctors and dental surgeries cannot cope with the volume of people at present. As all of the above states Canveys needs, unless the infrastrcutre is sorted the current plan is unsound and does not meet the required legal requirements and is unsafe.		

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0934 - 0001	Individual	John	Stone		Yes	SP3	No	Excluding and/or failing to adequately consider strategic alternatives across the Borough, including the obvious site North West Thundersley commonly known as the Blinking Owl site. Due to a lack of consideration of perfectly reasonable green belt / grey belt sites the proposed plan appears to be predetermined due to a no building on green belt policy. There is no credible five year housing land	No	Effective, Justified, Consistent with national policy	The draft local plan is not consistent with National Policy. It does not meet the housing target for Castle Point. The Council has not provided adequate and strong enough evidence for not meeting the Government's housing targets. Development should be directed away from areas of highest risk of flooding. Canvey Island has the highest flood risk category in the Borough and yet has been allocated the highest number of dwellings of all the Borough areas. There is a risk of tidal flooding in the future due to environmental challenges. The surface water drainage often only just copes and at times, and additional dwelling on this scale will make the problems worse leading to more surface water flooding incidents. The foul water system is pumped, often through small bore pipework, and barely copes at times with the present dwelling numbers on the Island. Due to Canvey Island's unique geography there is a need for open undeveloped land to act as drainage and flood planes. The Strategic Drainage Design measures applied are not appropriate for Canvey Island's unique geography and drainage infrastructure. The road system on Canvey Island cannot cope at peak times or if there is a road traffic incident on or around the Island, the Island is often gridlocked. The road network needs much improvement as things stand and would not cope with an additional 3000 plus dwellings.	The North West Thundersley site should be included in the plan. The site is approximately 187 hectares of Grey Belt, Brown Belt, Green Belt land possibly accommodating 7500 dwellings. Adoption of this site would least significantly affect the residents of Castle Point and is far more suitable for development than Canvey West. Reducing the urban housing target for the Borough	No	Not Answered	Not Answered	A	North West Thundersley Green/Grey Belt No five year housing land supply Consultation process difficult Not meeting the housing target Flood Risk on Canvey Transport COMAH Emergency evacuation	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. 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	N

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								supply. Due process has not been fulfilled in that the Regulation 18 and this regulation 19 Consultation has been overly complicated and onerous for the average person to complete and hence the individuals right to engagement in the process with many residents giving up on their right to make a proper response. The right to make an informed response has been denied due to the poor set up at the			It can take 45 minutes to get from the Town Center to the Canvey West area (under two miles in distance) and adding 2000 homes in Canvey West would make the journey unbearable both at the West end of the Island and further down the Island due to the backing up effect and due to the additional dwellings to the South and the Town Center. The proposed Canvey West site is very close to the two Top Tier COMAH sites situated on the Island. When considering what happened in Buncefield this exposes residents in any new development in Canvey West to un-necessary risk. Emergency escape for the whole Island would be impossible. The site selection strategy appears to be biased and predetermined towards a 'no green belt inclusion' policy. The Council have not considered adequately other Grey Belt/ Green Belt sites and excludes the North West Thundersley (Blinking Owl) option which therefore directs development towards unsuitable and higher risk areas such as Canvey West. The Canvey West proposal puts other residents on the Island at higher risk in the event of an emergency evacuation requirement. The 3000 plus dwellings proposed for Canvey Island including the 2000 for Canvey West is not resident led. The suggested density of homes in Canvey West is far to high and needs to be reduced. The density would suggest that	from 6200 dwellings to 3500 dwellings including reducing Canvey Island's allocation to 1050 dwellings. Include the provision that none of the final housing allocation on Canvey Island be built until the road infrastructure is totally overhauled and improved. Include the provision that no dwellings be built within the blast radius of the two Top Tier COMAH sites.								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. 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.	

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								open meetings. There is no clear evidence of the fulfillment of the Council's 'Duty to Co-Operate.			buildings would need to be built higher which would completely alter the nature of the area and Island. Canvey Island is classified as having the highest level of deprivation in Castle Point and the proposed plan will not improve the situation in any way likely making the situation worse. The 3000 plus dwellings for Canvey Island and the 2000 dwellings proposed for Canvey West should be reconsidered. It does unfortunately appear that the Council have decided to dump the Borough's housing numbers on Canvey Island. The Castle Point Plan, as it stands, will be detrimental to the Health and Wellbeing of the Island residents.							No 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 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	

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																		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. Consultation Process concerns 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. 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.	

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																		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 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. Flood Risk on Canvey Whilst Canvey is at	

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																		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 relation to Canvey. 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	

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																		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. COMAH 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 have HSE consultation zones identified	

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																		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 development is proposed.' 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	

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																		zone, as well as the Thorney Bay Park Homes site. 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 health and safety grounds'. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/	

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0934 - 0002	Individual	John	Stone		Yes	E1	No	Excluding and / or failing to adequately consider strategic alternatives across the Borough. There is no clear evidence of the fulfillment of the Councils 'Duty to Co-operate.	No	Effective, Justified, Consistent with national policy	The nature of Charfleets Industrial Estate and the types of businesses contained on it has not been properly evaluated. Many of the businesses do not appear to have any idea of what is being proposed. These types of businesses are not suitable for habitable dwellings above them. Should redevelopment of the estate proceed at the level suggested this would cause severe problems for many of these businesses leading to many of them closing down either willingly or forcibly. Any new estate as suggested with dwellings above the businesses would soon become like a ghetto and would not be a very nice place to live and would be detrimental to the Health and Wellbeing of the estate's residents. Charfleets is within the blast radius of the two Top Tier COMAH sites. The drainage system, both surface water and foul, would not cope.	Reduce the urban housing target for the Borough. Consider other more suitable sites across the Borough especially North West Thundersley.	No	Not Answered		A	Strategic Alternatives Duty to cooperate Concerned about the business uses next to residential on E1 COMAH Flood Risk on Canvey North West thundersley	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. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). Duty to Cooperate Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. The Council has	N

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																		worked collaboratively with all to ensure that the Duty to Cooperate has been met. Buisness uses next to residential on sites covered by policy E1 ie C4 West Canvey. This states at paragraph 8.36 There are a mix of uses within the industrial estate including offices, gyms, nurseries, car sales and also heavier industry such as steel manufacturing. It is therefore important that the Master Plan for the area sets out a land use strategy that encourages renewal and regeneration but avoids issues of residential amenity and addresses the agent of change principle for noisy businesses already in the area. COMAH 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.	

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																		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 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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																		development is proposed.' 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. 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 health and safety grounds'. Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood	

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																		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. 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	

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																		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.	

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0939 - 0001	Individual	Greer	Stone		Yes	SP3	No	The Consultation is overly complicated and onerous for the average person to complete. The Consultation events were not run as a proper consultation and were more of a display saying this is what we are going to do. The above the residents right to engagement and right to response has been denied. There is no clear evidence of the Council's duty to cooperate with other authorities such as Essex	No	Positively prepared, Effective, Justified, Consistent with national policy	The Plan is not resident led for Canvey Island. Development should be directed away from areas of highest flood risk. Canvey Island is the highest flood risk category in the Borough. There has been no proper consultation with the sewage authority for Canvey Island. The foul water system barely copes at present and would be overwhelmed if 3000 plus additional homes were added. The proposed Canvey West Site and Charfleets site are dangerously close to the two Top Tier COMAH sites exposing potential residents to unnecessary risk. The Canvey Island proposals are not resident led. The Canvey Island West proposal puts the Island at risk in the event of an emergency evacuation. The road network is gridlocked as things stand and cannot cope with the additional homes being proposed. The routes on and off the Island is gridlocked for much of the day and at weekends and so many additional homes would impair on the quality of life for Island residents.	The urban housing target for the Borough should be reduced especially for Canvey Island with consideration being given to building on greybelt or small areas of suitable greenbelt instead. Include provisions that none of the final housing allocation on Canvey Island be built before the road and drainage infrastructure is totally overhauled and improved. Include a provision that no	No	Not Answered	Not Answered	A	Consultation too complicated Duty to Cooperate Other strategic sites not considered Flood Risk on Canvey COMAH Transport Greenbelt /Greybelt	Consultation 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. Other strategic sites not considered All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from	N

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								County Council or Anglian Water. I have been told that there has not been a proper discussion with Anglian Water (Canvey Island's sewage authority) regarding the excessive number of dwellings being added to the already overloaded sewage system. The Council has not adequately considered strategic alternative sites across the Borough. The Council have proposed that nearly half of the Borough's				additional homes be built near the two Top Tier COMAH sites. Adjust the proposed plan directing new building away from the highest flood risk areas of the Borough. Include the North West Thundersley site (Blinking Owl) in the plan. This site would create its own small village with all of the necessary infrastructure and would lead to the least disruption to the Borough overall.						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. COMAH 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	

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								assessed housing needs be placed in the highest flood risk area in the Borough. The Council have not taken proper consideration of the two Top Tier COMAH sites on Canvey Island.										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 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.' The current HSE consultation zones are indicated on the policies map. The	

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																		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. 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 health and safety grounds'. 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	

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																		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. Green/GreyBelt 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,	

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																		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. 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.	

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1412 - 0001	Individual	Megan	Stone		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.	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 1 050, Hadleigh at 305. 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	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 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	N

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																		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 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	

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																		option 4) outlines why North West Thundersley was not preferred. 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 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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																		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.	
1412 - 0002	Individual	Megan	Stone		Yes	Had2	Not Stated	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 conservati	Not Stated		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 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	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.	No				Support for policy HAD2 but concern that the plan for over 6000 homes puts this site at risk for speculative development	Support noted. Should the plan be adopted this will safeguard from speculative development.	N

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								on, 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.			farmland site, and I hope the Salvation Army agree with this direction.								

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0378 - 0001	Individual	Geoffrey	Stow		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 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 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	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.							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 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	

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																		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 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	

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																		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. 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 capacity of the highway network in and around Castle	

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																		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. 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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0379 - 0001	Individual	Pauline	Stown		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 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 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	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.							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 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	

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																		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 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	

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																		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. 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 capacity of the highway network in and around Castle	

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																		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. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	
0066 - 0001	Individual	Julian	Strauss		Yes	Whole Plan	Yes	Dear Sir/ Madam , I support the Castle Point plan regulation 19 Draft	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant ,	Support Noted	N

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								Consultation. I consider the draft plan to be legally compliant. I consider the draft plan to be sound.											
1006 - 0001	Individual	Peter	STREET		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant.	Support noted.	N
0846 - 0001	Individual	Gary	Strohmmer		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	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	No	Not Answered	Not Answered		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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											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 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. 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.	target of 11,000.							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, and from that point onwards. For further information please see housing topic paper.	North West Thundersley North West Thundersley is in the Green Belt. For those	

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																		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. 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	

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																		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. 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. Support for HAD2 Noted. A policy for the Green Lung in	

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																		Hadleigh is not considered necessary as the land is safeguarded by policy HAD7	
0858 - 0001	Individual	Carole	Sullivan		Yes	SP3	No	I am not a lawyer so I don't know whether it is legally compliant. However there is no don't know choice to tick. My laypersons opinion is that it is illegal in common law to force	No	Positively prepared, Justified	Please see my answer to question 2b above.	For the plan to be sound, it must include full details on how extra housing will not result in excessive additional road traffic eg by explaining how extra roads will be built to	No	Not Answered	Not Answered	A	No housing due to increased traffic	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	N

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								housing on local people where the population density is already very high resulting in over busy roads and lack of services.				accommodate the extra traffic. It should also explain how additional traffic will not go onto surrounding roads so that the safety of families is assured. If it fails to do this it is unreasonable to expect local people to accept it. Extra housing should not be built on Scrub Lane because the road will not cope with the extra traffic. Better to build upwards on the A13 or even						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 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. 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	

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												better go back to central government via our MP to explain why we can't take as much housing as they want. They can build on large country areas such as national parks instead where traffic is very light. Finally, increased traffic for local people in Castle Point is starting to make it impossible to visit places like national parks which are inaccessible to public transport. So spread the						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.	

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												housing across the UK more equitably, including where richer people live such as the Cotswolds.							
1080 - 0001	Individual	Victoria	Sullivan		Yes	Consultation	No	I understand that a consultation has to be robust and relevant evidence and documentation provided, but the 230 page document, and overly complicated form (this form) are too complex for the average person, this includes the fact that you are asking people to reference	No	Positively prepared	I understand that a consultation has to be robust and relevant evidence and documentation provided, but the 230 page document, and overly complicated form (this form) are too complex for the average person, this includes the fact that you are asking people to reference different parts of the consultation document. I think this is a construct to make it too difficult so people do not bother to object. How is the average person to know if the consultation is sound or legally compliant?	I understand that a consultation has to be robust and relevant evidence and documentation provided, but the 230 page document, and overly complicated form (this form) are too complex for the average person, this includes the fact that you are asking	No	Not Answered	Yes	A	Consultation too long to deter responses	A summary document was also provided but it is a legal requirement to consult on the whole document.	N

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								different parts of the consultation document. I think this is a construct to make it too difficult so people do not bother to object. How is the average person to know if the consultation is sound or legally compliant?				people to reference different parts of the consultation document . I think this is a construct to make it too difficult so people do not bother to object. How is the average person to know if the consultation is sound or legally compliant?							

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1081 - 0001	Individual	Daniel	Sullivan		Yes	SP3	No	This process for objection and the very long document and form for objection is too unwieldy for the average person. You are not enabling your population to be able to voice their opinions and objections easily. This approach lacks accessibility and isn't inclusive.	No	Positively prepared, Effective, Justified	Objection to Proposed Housing Development on Canvey Island I am writing to formally object to the proposed housing developments on Canvey Island as part of the Castle Point Local Plan. While I understand the need for housing nationally, I believe this proposal is deeply unsuitable for Canvey Island for the following reasons: 1. Unsustainable Infrastructure and Access Canvey Island has only two access roads, both of which are frequently congested. During peak hours, weekends, or in the event of an accident, the island becomes gridlocked. The Waterside Farm roundabout is a known choke point, and additional housing will only increase traffic volumes, making daily life more difficult and potentially dangerous in emergencies. 2. Overpopulation and Pressure on Services Castle Point is already one of the most densely populated areas in the country. Adding more homes will place further strain on already overstretched public services, including healthcare, schools, and social care. Crucially, Castle Point Borough Council does not have commissioning responsibility for these services, meaning there is no guarantee that the necessary infrastructure will be delivered alongside the housing. 3. Flood Risk and Environmental Concerns Parts of Canvey Island are		No	Not Answered	Yes		Lack of inclusivity on the consultation Traffic concerns Flood risk on canvey Lack of opportunities for over 16 education Lack of investment in people	Consultation 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. 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.	N

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											located on flood plains, and the island has a history of flooding, including serious incidents in recent years. Building more homes in these areas is irresponsible and puts future residents at risk. It also increases the burden on flood defences and emergency services. 5. Lack of Opportunity and Educational Provision Canvey Island already suffers from limited access to further and higher education. There are no colleges or universities on the island, and the only local post-16 provision is limited in scope. Young people must travel off-island to access a broader range of courses, which is a barrier—especially for those from lower-income families. Castle Point ranks poorly in national opportunity indices, and Canvey Island in particular has lower educational attainment and life expectancy than the mainland. Building more homes without investing in education, skills, and opportunity will only deepen existing inequalities. 6. No Investment in People This plan focuses on physical development without addressing the needs of the population. There is no parallel investment in education, transport, or economic opportunity. We risk creating a larger population with fewer prospects, worsening outcomes for current and future								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 relation to Canvey. Over 16 education Policy E3 - development of local skills has been included to ensure that education and skills are invested in. Lack of investment in people	

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											residents. Conclusion Canvey Island is not a suitable location for large-scale housing development. The island's infrastructure, geography, and socio-economic challenges make this proposal unsustainable and potentially harmful. I urge the council to reconsider and instead focus on improving opportunity, education, and quality of life for existing residents before expanding the population further.							The objectives of the castle point plan as set out on page 18 have people at the heart of them addressing environment, economic and social impacts.	
1081 - 0002	Individual	Daniel	Sullivan		Yes	C4	No	This process for objection and the very long document and form for objection is too unwieldy for the average person. You are not enabling your population	No	Positively prepared, Effective, Justified	4. Loss of Employment Land The proposed development in the Charfleets area threatens to displace local businesses and reduce employment opportunities. This land is currently designated for employment use and plays a vital role in supporting the local economy. Replacing it with housing undermines long-term economic sustainability.		No	Not Answered	Yes		Objecting to C4 due to loss of jobs and employment space on charfleets	Policy C4 includes an increase of 10% commercial floorspace and will not result in the loss of commercial space.	N

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								to be able to voice their opinions and objections easily. This approach lacks accessibility and isn't inclusive.											
1103 - 0001	Not Answered	Victoria	Sullivan		Not Answered	SP3	No	I understand that a consultation has to be robust and relevant evidence and documentation provided, but the 230 page document, and overly complicated form (this form) are too complex for the average person, this includes the fact that you are asking people to reference different parts of the	No	Positively prepared	Objections to the Proposed Housing Development in Castle Point – Focus on Canvey Island Part 1: Main Objections 1. Severe Access and Traffic Issues Canvey Island already suffers from significant traffic congestion, particularly during rush hours and weekends. The island becomes gridlocked when incidents occur on or near the main access routes. The Waterside Farm roundabout is a known bottleneck, and additional housing will inevitably increase the number of vehicles, worsening an already overburdened road network. 2. Overpopulation and Density Castle Point is already one of the most densely populated areas in England. According to your own consultation report, in 2021 there were 14.3 people per football pitch-sized piece of land, up from 14.1 in 2011. This places the borough in the top 30% of the most densely populated local authorities in the country. Adding more housing will only intensify this pressure. 3. Strain on Public Services		No	Not Answered			Transport Development is too dense Infrastructure Flood risk on Canvey Further education on Canvey	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. Dense Development	N

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								consultation document. I think this is a construct to make it too difficult so people do not bother to object. How is the average person to know if the consultation is sound or legally compliant?			Each new home is likely to house multiple residents, increasing demand on schools, healthcare, social care, and other essential services. However, Castle Point Borough Council does not commission or control these services, meaning there is no guarantee that the necessary infrastructure will be provided to support population growth. 4. Flood Risk Some of the proposed housing is planned on flood-prone land. Canvey Island has experienced flooding in the past decade due to inadequate infrastructure, and its history includes the devastating floods of the 1950s. Building on flood plains is irresponsible and puts future residents at risk. Part 2: Education and Opportunity 1. Low Opportunity and Social Mobility Castle Point ranks 390 out of 533 in the Sutton Trust Opportunity Index, which measures access to opportunity based on education, employment, and socio-economic background. This reflects a serious lack of access to high-quality jobs, education, and skills training—particularly on Canvey Island. 2. Lack of Local Employment Opportunities There are few high-quality jobs with progression opportunities in Castle Point. The consultation report notes that 98% of local businesses are micro or small enterprises,							The council has taken an urban first approach to development which is aligned with national planning policy. Densities prescribed are based on the density and capacity study which is available to view on the website. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). 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.	

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											which typically lack the capacity to offer apprenticeships or career development. This forces residents to commute off-island, further straining the limited transport infrastructure. 3. Transport as a Barrier to Opportunity Canvey Island’s geography and limited transport links restrict access to education and employment. Research from Parliament and the Local Government Association shows that poor transport infrastructure significantly limits economic inclusion. Young people from lower-income backgrounds are particularly affected, as the cost and complexity of travel can prevent them from pursuing further education or training. 4. Inadequate Further and Adult Education Provision There are no further education institutions on Canvey Island. The Xtend campus offers limited higher education options, primarily in early years education, which lacks diversity and does not meet the needs of all young people—particularly boys or those interested in trades or academic pathways. While some provision exists in Benfleet (USP College, King John, Appleton), travel remains a barrier. Adult education is also severely lacking. Castle Point has no responsibility for education, which falls under Essex County													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. Further education on Canvey Policy INFRA2 seeks to safeguard and encourage further education	

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											Council. This disconnect means that planning for new housing does not automatically include planning for the educational needs of the population. 5. Educational Underperformance Only 20% of students in Canvey Island’s secondary schools achieved a grade 5 or above in English and Maths last year. Progress 8 scores—used to measure student progress—are significantly below the national average. This indicates that young people are not receiving the quality of education needed to succeed, perpetuating cycles of disadvantage and inequality. 6. Health and Socioeconomic Inequality While overall life expectancy in Castle Point is in line with national averages, there are stark disparities between Canvey Island and the mainland. In 2022–23, 20.5% of under-16s in Canvey lived in relative low-income families. These inequalities are compounded by poor educational outcomes and limited access to opportunity. Conclusion While infrastructure concerns are often raised in response to housing developments, the issues facing Canvey Island go far deeper. The proposed developments risk worsening existing inequalities and placing unsustainable pressure on services that the borough does not control. There is								

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											investment in housing, but no parallel investment in the people who live here. We are creating a perfect storm: more people, fewer opportunities, and no clear plan to address the underlying issues. Canvey Island residents deserve better. They deserve access to good jobs, quality education, and a future they can aspire to. Building more houses without addressing these fundamental challenges will only deepen the divide.								
1103 - 0002	Not Answered	Victoria	Sullivan		Not Answered	C4	No	I understand that a consultation has to be robust and relevant evidence and documentation provided, but the 230 page document,	No	Positively prepared	5. Loss of Employment Land The Charfleets area, earmarked for housing, is currently designated for employment. Replacing this with residential development risks the loss of local jobs and undermines the economic sustainability of the island.		No	Not Answered			Policy C4: Concerned about loss of jobs	Policy C4 includes an overall increase in industrial floor space of 10% and therefore will not result in a loss of employment	N

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								and overly complicated form (this form) are too complex for the average person, this includes the fact that you are asking people to reference different parts of the consultation document. I think this is a construct to make it too difficult so people do not bother to object. How is the average person to know if the consultation is sound or legally compliant ?											
1386 - 0001	Individual	Colin	Sullivan		Yes	Whole Plan	Yes	I support the Castle Point Plan Draft	Yes		I consider the Draft Plan to be sound. Plan 25/0778/OUT Strongly object to above plan, would						Castle Point Plan is sound and	Support Noted	N

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								I consider the Draft Plan to be legally compliant			cause chaos in area where schools and doctors surgery filled to capacity. This does not take into consideration peoples homes which will be ruined by deliveries of building products being taken to site during days. This plan has been refused before and nothing has changed.						legally compliant , Concerned about a planning application on Glebelands		
0140 - 0001	Individual	Lee	Summerville		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". NPPF guidelines state that	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).

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																	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.		

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0140 - 0002	Individual	Lee	Summerfield		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
0845 - 0001	Individual	Katy	Summerhayes		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	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		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	N

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											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, 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. 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.														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 point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic	

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																		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. 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	

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																		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. 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. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the	

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																		land is safeguarded by policy HAD6	
1409 - 0001	Individual	Andrew	Summers		Yes	Whole Plan	Yes		Yes								Castle Point Plan is sound and legally compliant ,	Support Noted	N
1410 - 0001	Individual	Glenis	Summers		Yes	Whole Plan	Not Stated		Yes								Castle Point Plan is sound and legally compliant ,	Support Noted	N
0147 - 0001	Individual	Bradley	Swann		Yes	SP3	No	Dear Sir/Madam , I DO NOT support the Castle	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.	PROPOSED MODIFICATION: Add North	Not Stated		No		Housing target for Castle Point not met. The site	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA	Y - Policy SD3(3) 3. Proposals must demonstrat

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								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.			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.	West Thundersley 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	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.	e 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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																	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.		
0147 - 0002	Individual	Bradley	Swann		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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0240 - 0001	Individual	Heleen	Sweeney		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		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	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. 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.	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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																	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	Canvey SuDS options have been considered through the SFRA.	

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																	procedures.		
0240 - 0002	Individual	Heleen	Sweeney		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
1330 - 0001	Individual	Brenda	Tanner			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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1330 - 0002	Individual	Brenda	Tanner			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 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	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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																		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 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	

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																		why North West Thundersley was not preferred. 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 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	

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																		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. 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 design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1330 - 0003	Individual	Brenda	Tanner			C4					The number of Canvey West homes puts residents in the East		No				Development at West	The safety of all Castle Point residents is a priority	N

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											at risk with emergency evacuation procedures						Canvey will impact emergency evacuation procedures for those residents living at East Canvey	and has been considered within the Castle Point Plan	
1382 - 0001	Individual	John	Tanner			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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											at risk with emergency evacuation procedures						Canvey will impact emergency evacuation procedures for those residents living at East Canvey	and has been considered within the Castle Point Plan	
0352 - 0001	Agent	Mike	Tanousis	Dove Jeffrey Homes		SP3	No	I thought I would write to you to explain the following information regarding Castle point Council and their latest local plan will identify to you that Castle point council are an example of why the government will never achieve the deputy Prime Minister Angela Rayner's target at 1.5 million homes Castle	No		Questions for the Government 1. Will the Department use its intervention powers, for example by commissioning a directly-prepared plan or removing plan-making powers if an authority's Regulation 19 draft is demonstrably non-compliant? 2. What further sanctions or incentives (financial, Housing Delivery Test penalties, or planning freedoms) does the Government envisage to realign local political incentives with national objectives? We would be grateful for your response to these questions and for an outline of the steps you intend to take to ensure that councils such as Castle Point cannot continue to thwart the Government's housing-delivery ambitions. It frustrates me that we finally have a government that recognises the strategic significance of housing, and then a local council like Castle Point seems to be actively undermining it. The key objective to build houses for the youth and other people of the country by having rental mortgage to pay gets people to						Suggests that CPBC is directly undermining the Labour government's desire to get Britain building again. Requests government intervention	Noted	N

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								Point Borough Council's continuing failure to plan for housing I am writing to seek your views on, and the Government's intended response to, the latest Regulation 19 draft Local Plan published by Castle Point Borough Council (CPBC). I strongly believe in the Labour government's housing plan, and our view is that CPBC is directly undermining the Labour government's desire to get Britain building again. A decades-long absence of			work not sitting around I'm not sure about this not working not drinking taking drugs or committing crimes. We need you to finally push the country forward and back to where we should be in the world. If you wish to meet us and discuss all the all the issues and topics regarding Castle point and the application and the future of the of the Castle point region we will be happy to meet with with us and members of the consortium if you need any further details, let us know or if you want to attend the sites and look at the local area which I think it would be incredibly important then that we're very happy to step up or either organise an online call or a physical meeting .								

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								a sound plan Castle Point has not had an adopted, up-to-date Local Plan since 1998. In December 2023, the then Secretary of State, Rt Hon Michael Gove MP, issued a formal direction, warning that the Department would intervene unless CPBC set and met a credible timetable for submission and adoption. The Regulation 19 draft ignores the NPPF housing requirement The standard-method figure published											

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								by DLUHC in May 2025 indicates that Castle Point must plan for 686 dwellings per annum (Approx. 11,660 homes over the 17-year plan period 2026-43). By contrast, the draft plan provides for only 6,196 homes, representing barely 53% of the minimum need. In other words, the Council openly accepts that its plan is not “positively prepared” nor “consistent with national policy”, contrary to paragraph 36 of the											

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								NPPF. Castle Point has spent £1.6m of taxpayers' money on developing an inadequate housing plan once again. If you build on this land, the ground floor is only usable for storage or a car. To build this floor cost approximately £60,000 of government and taxpayers wasted money. Castle point council are abusing the existing government and have been doing so since 1998. Where is a company Dove property											

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								group and Dove Jeffery homes we were proposing and working with counsellor calling for local sites since 2005 over a period of 20 years. We have spent a considerable amount of money in time Trying to bring forward a credible scheme to build affordable housing for local residents and young people with a total of 36 acres currently under our control but also we have formed the north west thundersley consortium over 100											

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								acres of Greybelt Land which potentially could deliver up to 4000 homes in NW Thundersley for Castle Port Council and the local residents with other developers . Which this would link to major roads relieve the traffic and also various hospital schools and infrastructure you know we have done the studies in the master plan on this. The land is actually a grey belt site which were outlined to the council											

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								in a meeting and explained all our latest plans in early 2025 and they were very keen on the concept and proposal. It is the opinion of many in the borough that the council doing this to please a few local and influential people with vested interest and a lot not looking to the future of the borough particularly the young people the homeless and key lead 3 to 4 bedroom home starter											

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								homes in the region of £400,000 to 500,000 which doesn't give a young people a chance to get on the housing ladder and this is what we want to do. It's our aim as a company as an ethical builder and company having built thousands of houses in this particular Essex Suffolk Norfolk region we have the necessary experience and track record to deliver that a product for young people that is affordable and is within the government											

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								t guidelines and objectives. The general consensus is that the government needs to put their foot down and put pressure on these councils to deliver and show who is in control about the future development of our country and its planning requirement. Misaligned incentives Councillors have made no secret of the fact that releasing Green Belt land is electorally toxic. Their incentive is therefore to publish an undelivera											

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								ble plan, secure in the knowledge that: ● Speculative development will be blamed on Planning Inspectors, not local politicians. ● Castle Point is likely to be merged into a new “South Essex” unitary authority under current reorganisation proposals; members prefer to leave politically difficult decisions to the successor council. The result is a plan that frustrates both Government housing objectives and the											

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								wishes of the electorate that voted overwhelmingly for change at the last general election.											
0145 - 0001	Individual	Pat	Taylor		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	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	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".	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

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								y. It has no credible five-year housing land supply.			Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						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		SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA) .

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																	puts residents in the East at risk with emergency evacuation procedures.		
0145 - 0002	Individual	Pat	Taylor		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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0383 - 0001	Individual	June	Taylor		Yes	SP3		BY HAND TO; CASTLE POINT BOROUGH COUNCIL I am attaching this letter to the Booklet provided to make comments to Castle Point Plan Regulation 19 Draft document. I request that you note my comments and objections in connection with the above mentioned draft plan. The key points I wish to raise in this response regarding the draft plan are: o Castle Point faces serious challenges , including surface water									o Castle Point faces serious challenges , including surface water flooding, infrastructure strain and pressure to accommodate growth. o The proposed allocation of the vast number of homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. o The Council's removal of several Green Belt sites	<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> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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								flooding, infrastructure strain and pressure to accommodate growth. - o The proposed allocation of the vast number of homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints - o The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. - o North West Thundersley offers a sustainabl									is commendable and reflects strong community engagement. - o 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. - o The plan lacks a demonstrable five-year housing land supply, critically	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>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	

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								e 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. o 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									undermining its credibility and resilience.		

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								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											

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								addressed before submission for examination. The above 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,											

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								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 meet these tests. 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											

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								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 has considered every viable alternative. No reference to alternatives at all in the marketing material. Please note my objection and I would be											

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								happy to talk to anyone to discuss my concerns further. I have attended a few of the various meetings held but find it difficult to discuss and receive answers in regard to evidence based queries I raise.											

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0576 - 0001	Individual	Cheryl	Taylor		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 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 procedure s	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 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	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.						Need for a third road to be included in the plan.	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 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.	

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																		Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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 capacity of the highway network in	

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																		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. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey,	

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																		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 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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0576 - 0002	Individual	Cheryl	Taylor		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 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 has been identified through the Open		N

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																		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.	
0576 - 0003	Individual	Cheryl	Taylor		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
0668 - 0001	Individual	Joan	Taylor		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant ,	Support noted.	N
0888 - 0001	Individual	James	Taylor		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound	Support noted.	N

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													were d				and legally compliant ,		
1280 - 0001	Individual	Lestey	Taylor			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-	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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	

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																	infrastructure , the proposed 3316 urban homes for Canvey is not resident led	options have been considered through the SFRA.	
1280 - 0002	Individual	Lestey	Taylor			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1280 - 0003	Individual	Lelsey	Taylor			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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1287 - 0001	Individual	Mr AJ	Taylor			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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1287 - 0002	Individual	Mr A J	Taylor			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1287 - 0003	Individual	Mr A J	Taylor			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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1288 - 0001	Individual	Mrs AJ	Taylor			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1288 - 0002	Individual	Mrs AJ	Taylor			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									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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1288 - 0003	Individual	Mrs AJ	Taylor			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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1277 - 0001	Individual	Linda	Tebb			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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1277 - 0003	Individual	Linda	Tebb			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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0024 - 0001	Individual	Kerri	Thipthorpe		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	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	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	Not Stated		No			Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • 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	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 • 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. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery	N

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								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			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 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)	ities, 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. Essex County Council is investing in infrastructure and would be legally obliged to					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.	mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								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			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 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	cooperate . North West Thundersley offers a strategic opportunity for sustainable growth.							

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								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			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,								

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								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 constructiv				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. 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							

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								e 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			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, 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								

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								ire 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			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 demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous								

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								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 undermini			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 Fairglens 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,								

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								ng 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			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								

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								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.			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. 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								

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								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			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.								

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								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;											

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								they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											
0024 - 0002	Individual	Kerri	Thipthorpe		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	No	Not Stated			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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								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											

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								risks being found unsound on procedural grounds alone.											
1104 - 0001	Individual	Darren	Thipthorpe			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.	No		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	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					Flood risk Infrastructure capacity Flood risk on canvey Highway infrastructure Supports protection of the greenbelt North west thundersley Lack of five year housing land supply Lack of duty to cooperate Evidence for not meeting housing numbers	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. Infrastructure capacity Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). 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	N

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								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			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 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	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. Essex County Council is							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. Highway infrastructure 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	

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								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			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 discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The	investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.						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. Supports protection of the greenbelt Support noted 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. Lack of five year	

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								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			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 as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised							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 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	

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								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			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. 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							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. Lack of duty to cooperate supporting Statements of Common Ground. The Council has worked collaboratively with all to ensure that the Duty to Cooperate has been met. Evidence for not meeting housing numbers 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	

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								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			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, 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							the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. While the Plan does not meet the standard method housing requirement, this does not automatically mean that it is not sound. A sound plan must be based on a robust and credible evidence base and reflect the realities and constraints of the area. The proposed housing figure is justified by robust evidence which the Council will set out during the examination.	

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								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			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 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								

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								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 demonstra			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 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								

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								ble 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			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, 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								

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								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			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 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								

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								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			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 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.								

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								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											

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								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.											
1104 - 0002	Individual	Darren	Thipthorpe			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	No								Lack of 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.	N

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								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											

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								risks being found unsound on procedural grounds alone.											
0487 - 0001	Individual	Graham	Thomas		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.					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	<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> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	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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																	mined towards a "no greenbelt build policy". Site selectiction 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	<u>North-West Thundersley Northwest</u> 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>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey 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	

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																	Island's unique geography and drainage infrastructure.	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.	
0487 - 0002	Individual	Graham	Thomas		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.						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
0730 - 0001	Individual	Sharon	Thomas		Yes	Whole Plan	Yes		Yes	Consistent with national policy			Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant	Support noted.	N

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0862 - 0001	Individual	Peter	Thomas		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, it's solely based on the "over development of Brownfield sites",has not considered all sites,with no Greenbelt/Grey Belts sites added,and 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, SSS1,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 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 the urban sprawl,its a buffer zone,the effect on the highways and traffic, lack of infrastructure protecting our farmland and wildlife out of character, open spaces,heritage,archaeology, promoting historic links, and use grey belt first. Any development on this site effects both	Add North West Thundersley site,187 Ha,as a Greenbelt , Grey Belt,Brownfield site option for7,000 homes. Reduce the urban housing target to 3,000 from 6200 with Canvey at 1050,and Hadleigh at 305. Total housings 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 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	N

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											Hadleigh and the neighbouring areas of Leigh on sea.I can fully support this Had2 Policy with no housing development ever on this farmland site and 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.							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 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	

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																		option 4) outlines why North West Thundersley was not preferred. 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 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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																		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. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD7	

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1253 - 0001	Individual	Brian	Thomas			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1253 - 0002	Individual	Brian	Thomas			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1253 - 0003	Individual	Brian	Thomas			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
1404 - 0001	Individual	Pat	Thomas		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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0316 - 0001	Individual	Amy	Thompson			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.				A	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. 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	Grey belt covered under policy GB2. SLAA and Sa considered all reasonable site options. North-West Thundersley: 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. Flooding and infrastructure 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. Needs of emergency services considered	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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																	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. development should be directed away from areas at highest	in the supporting Infrastructure Delivery Plan (IDP).	

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																	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.		
0316 - 0002	Individual	Amy	Thompson			C4	No	Canvey West homes	No	Not Stated						A	The number of Canvey	Needs of emergency services considered in the supporting	N

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								puts residents in the East at risk with emergency evacuation procedures.									West homes puts residents in the East at risk with emergency evacuation procedures	Infrastructure Delivery Plan (IDP).	
0403 - 0001	Individual	Lestey	Thompson		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				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	<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</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	d. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selectiction 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.	<u>Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <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>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and</u>	

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																	SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	<u>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.	
0403 - 0002	Individual	Lestey	Thompson		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.						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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0812 - 0001	Individual	Jane t	THORNE		Yes	SP3	Yes		No		There is no way Canvey island can have over 3000 homes built there!!!! Poor infrastructure, risk of flooding and only 1 way off. Traffic is horrendous as it is!!!!		No	Not Answered	Not Answered	A	Infrastructure Transport Third Road onto Canvey Flood Risk on Canvey 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 Point, including improved linkages to other areas. Growth in Castle Point will facilitate the delivery of the proposals in the Local Transport Plan 4. Third Road onto Canvey		N

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																		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 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	

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																		relevant transport improvement projects identified in the Local Transport Plan. 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 relation to Canvey.	

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0289 - 0001	Individual	Jacqui	Thornton		Yes	SP3	No	Dear Sir/Madam , I cannot support the Castle Point Plan Regulation 19 Draft Consultation in its current form. I do not consider the draft plan to be legally compliant for the following reasons: It has not been positively prepared. The plan does not have a clear strategy that meets the assessed needs of the area that is consistent with the latest update to national policy effective December 2024, nor was the Plans Reg	No	Consistent with National Policy	The Plan is not consistent with national policy in promoting sustainable development as the NPPF requires consideration of the combined impact of developments on air quality at a local level. The plan proposes overdevelopment of urban areas and evidence documents accompanying the plan state this will result in poorer air quality for future inhabitants than the alternative of a more spacial approach. In calculating its windfall allowance of 45 homes per year, the council appears to have included the car park at a Sheltered Unit in Hadleigh as a site identified as suitable to support windfall development. This is not the case. The car park is already 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 of the complex who would be impacted have not been sufficiently consulted on this allocation during the draft plan being prepared. 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. When questioned, Officers claimed the	PROPOSED MODIFICATIONS: Add North West Thundersley site Reduce densities in the Urban Town Centres Apply flooding and COMAH constraints to reduce allocation on Canvey Green Space Designation for GB6 Removal of Westwood Court Car Park from windfall allocation	Not Stated		No	A	The plan does not have a clear strategy that meets the assessed needs of the area that is consistent with the latest update to national policy effective December 2024, nor was the Plans Reg 19 Consultation implemented within the timeframe to benefit from transitional arrangements it seeks to utilise. The Plan fails to use the mandatory Standard Methodology to calculate its	<u>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Air Quality</u> Air quality impacts are assessed in the Sustainability Appraisal, including under objective 9.1. Annual Status Reports for Castle Point can be found on the Essex Air website along 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. <u>Windfall Allowance</u> The Windfall allowance map	N

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								19 Consultation implemented within the timeframe to benefit from transitional arrangements it seeks to utilise. The Plan fails to use the mandatory Standard Methodology to calculate its housing need, as defined in the updated NPPF, and cannot demonstrate a sustainable five year housing supply consistent with national policy. This consequently puts the strategic green belt it seeks to protect at greater risk			identification of Windfall Allowance sites was calculated using AI with no in person follow up was conducted to assess them, and consequently many of the sites may prove unsuitable. This leaves the calculation of the windfall allowance and its contribution to the housing total provided by the Plan flawed. By identifying the entirety of GB6 as Grey Belt land in evidence documents, there exists a conflict with National Policy because the council fails to acknowledge the existence of the Local Wildlife Site within the boundary of GB6. Local Area Wildlife Sites are designated for their high ecological value and habitats, making them important areas for nature conservation and NPPF includes protections for them and they are included in Footnote 7 of the NPPF. The council has also failed to consider the alternative possibility of affording the GB6 wider protection by designating it as Local Green Space. This could be possible due to the tightly woven network of bridleways, natural footpaths and wildlife sites that already offer green space, recreation and access to natural habitat for existing residents. This offers potential for residents and local wildlife and conservation organisations to draw funding for nature recovery and enhance the area's biodiversity and protect both the wildlife and integrity of the area. The draft local plan is not justified. The selection strategy is biased and						housing need, as defined in the updated NPPF, and cannot demonstrate a sustainable five year housing supply consistent with national policy. This consequently puts the strategic green belt it seeks to protect at greater risk of speculative development by providing a presumption in favour of development and the exceptional circumstances that justify permission. The Plan	included within the topic paper is an indicative map of potential windfall sites and are not allocated sites. The Windfall allowance has been calculated in accordance with historical trends. <u>GB6 and Grey Belt</u> It should be noted that GB6 has not been allocated for development in the Local Plan, Multiple environmental constraints on GB6 were identified in the Sustainability Appraisal, including multiple separate Tree Protection Orders, collectively covering approximately half the site and potentially severely limiting developability, ancient woodland on site - north east section does not appear developable for this reason, approximately 2/3 of site covered by Priority Habitats (Protected under 2006 NERC Act): Deciduous woodland and mixed habitats - difficult to develop without significant harm.	

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								of speculative development by providing a presumption in favour of development and the exceptional circumstances that justify permission.			predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Council Members have predetermined their stance on the Plan to fulfil an election pledge not to build on any Green Belt, failing to keep an open mind when considering evidence produced during the consultation period and have compromised the consultation by publicly informing residents that a failure to support the plan 'as is' will automatically result in all green belt being lost. Members and the council have failed to engage constructively with resident groups and residents who expressed concerns over the plan. Instead of listening to those concerns and responding with reasonable consideration, some Members have publicly insulted residents who questioned their approach. It is crucial that the alternative of NW Thundersley is rigorously pursued and obstacles challenged robustly in order that we can adhere to the Government policy in meeting their targets and not unnecessarily put the remaining strategic Green Belt Sites at risk through modifications by the inspector or intervention.						is not consistent with national policy in promoting sustainable development as the NPPF requires consideration of the combined impact of developments on air quality at a local level. The plan proposes overdevelopment of urban areas and evidence documents accompanying the plan state this will result in poorer air quality for future inhabitants than the alternative of a more spacious approach. In calculating	<u>North-West Thundersley</u> 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.	

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																	g its windfall allowance of 45 homes per year, the council appears to have included the car park at a Sheltered Unit in Hadleigh as a site identified as suitable to support windfall development. This is not the case. The car park is already 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 congestio		

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																	n 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 of the complex who would be impacted have not been sufficiently consulted on this allocation during the draft plan being prepared. The evidence document identifying it on the map, the Castle		

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																	Point Housing Capacity Topic Paper, was only uploaded on 15th August, two weeks after the Reg 19 Consultation on the Plan opened. When questioned, Officers claimed the identification of Windfall Allowance sites was calculated using AI with no in person follow up was conducted to assess them, and consequently many of the sites may prove unsuitable. This leaves the calculation of the		

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																	windfall allowance and its contribution to the housing total provided by the Plan flawed. By identifying the entirety of GB6 as Grey Belt land in evidence documents, there exists a conflict with National Policy because the council fails to acknowledge the existence of the Local Wildlife Site within the boundary of GB6. Local Area Wildlife Sites are designated for their		

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																	high ecological value and habitats, making them important areas for nature conservation and NPPF includes protections for them and they are included in Footnote 7 of the NPPF. The council has also failed to consider the alternative possibility of affording the GB6 wider protection by designating it as Local Green Space. This could be possible due to the		

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																	tightly woven network of bridleways, natural footpaths and wildlife sites that already offer green space, recreation and access to natural habitat for existing residents. This offers potential for residents and local wildlife and conservation organisations to draw funding for nature recovery and enhance the area's biodiversity and protect both the wildlife and integrity of the		

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																	area. 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". Council Members have predetermined their stance on the Plan to fulfil an election pledge not to build on any Green Belt, failing to keep an open mind when		

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																	considering evidence produced during the consultation period and have compromised the consultation by publicly informing residents that a failure to support the plan 'as is' will automatically result in all green belt being lost. Members and the council have failed to engage constructively with resident groups and residents who expressed concerns over the plan. Instead of listening to those concerns and		

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																	responding with reasonable consideration, some Members have publicly insulted residents who questioned their approach. It is crucial that the alternative of NW Thundersley is rigorously pursued and obstacles challenged robustly in order that we can adhere to the Government policy in meeting their targets and not unnecessarily put the remaining strategic Green		

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																	Belt Sites at risk through modifications by the inspector or intervention.		
0294 - 0001	Individual	Andrew	Thornton		Yes	SP3	No	Dear Sir/Madam, Please find below my Reg 19 Consultation submission to the Castle Point Plan. Please acknowledge receipt. I cannot support the Castle Point Plan Regulation	No	Consistent with National Policy	This consequently puts the strategic green belt it seeks to protect at greater risk of speculative development by providing a presumption in favour of development and the exceptional circumstances that justify permission. GB6 GB6 as a Strategic Green Belt site has been extended from H10 in the previous withdrawn plan to make it compliant with the councils policy that Strategic GB sites should accommodate over 100 dwellings. This includes land, including my own, that was not submitted in the CFS, nor do I consent to it being developed. By identifying the entirety of GB6	PROPOSED MODIFICATIONS: Add North West Thundersley site Reduce densities in the Urban Town Centres Apply flooding and COMAH constraint	Not Stated		No	A	<u>Housing Supply</u> Does not have a clear strategy that meets the assessed needs of the area that is consistent with the latest update to national policy effective	<u>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. Standard method achievable also considered in the SA. GB6 This site is not allocated for development. But it is noted that owner aspirations and sites not having been submitted is a further constraint on the realism of the	N

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								19 Draft Consultation. I do not consider the draft plan to be legally compliant as it has not been positively prepared and is not justified due to not being compliant with national policy. The plan does not have a clear strategy that meets the assessed needs of the area that is consistent with the latest update to national policy effective December 2024, nor was the Plans Reg 19 Consultation implemented			as Grey Belt land in evidence documents, there exists a conflict with National Policy because the council fails to acknowledge the existence of the Local Wildlife Site within the boundary of GB6. Local Area Wildlife Sites are designated for their high ecological value and habitats, making them important areas for nature conservation and NPPF includes protections for them and they are included in Footnote 7 of the NPPF. The area also consists of a large area of residential gardens (curtilage of existing dwellings), that are close and connected to the residential urban area enough that they should be afforded the exemptions identified from classification as PDL, as defined in the NPPF. The area includes equestrian grazing land that should also be afforded the exemptions identified from classification as PDL, as defined in the NPPF. In combination, these remove a substantially significant area of land that impacts the viability of GB6 as a viable strategic Green Belt site, and also redefines the possibility of Grey Belt designation. The plan, whilst it's objective seeks to protect strategic Green Belt sites from development, fails to consider the alternative of designating GB6 as a Local Green Space. This would not necessarily open land to the public that is in private ownership, as the designation itself does not mandate public access beyond what currently exists but offers	s to reduce allocation on Canvey Green Space Designation for GB6 Removal of Westwood Court Car Park from windfall allocation					December 2024, nor was the Plans Reg 19 Consultation implemented within the timeframe to benefit from transitional arrangements it seek to utilise. The Plan fails to use the mandatory Standard Methodology to calculate its housing need, as defined in the updated NPPF, and cannot demonstrate a sustainable five year housing supply consistent with national policy. GB6	overall housing target. Ecological constraints were identified in the SA/SEA and SLAA <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>Canvey</u> Constraints have been considered.	

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								ed within the timeframe to benefit from transitional arrangements it seek to utilise. The Plan fails to use the mandatory Standard Methodology to calculate its housing need, as defined in the updated NPPF, and cannot demonstrate a sustainable five year housing supply consistent with national policy.			protection for the site's special local significance, beauty, wildlife, and recreational value. The network of bridleways, footpaths and country lanes that cover the sites are well used by the community for recreational purposes and are well used and valued by residents. GB6 meets the 'particular circumstances' that qualify a piece of land for Local Green Space Designation protection as it is close to the community it serves and is demonstrably special to the local community. It fulfils the criteria required as listed below: (a) Beauty the network of bridleways, footpaths and county lanes covering GB6 demonstrate visual attractiveness, and it contributes to landscape, character and setting of the area. It contributes to local identity and character of the area and offers a sense of place, making an important contribution to the physical form and layout of its surroundings. It also links up with Coombe Wood and Thundersley Glen which allows views beyond GB6 which are valued locally. (b) Historic significance The land forms part of the historic plot-lands linked to Jarvis Hall and still contains evidence of original dwellings from over a century ago. The land provides a setting for, and allow views of these buildings and the council has already identified some as potential local heritage assets. (c) Recreational value The land supports a variety of activities including horse riding, walking						This includes land, including my own, that was not submitted in the CFS, nor do I consent to it being developed. It also includes residential gardens Argues it meets Green Belt criteria by virtue of beauty, historic significance, recreational value, richness of wildlife. Alleges GB6 falls with Local Wildlife Site <u>PROPOSED MODIFICATIONS:</u> Add North West Thundersley site Reduce densities		

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											and cycling and is of local significance for recreation and is valued by the community. (d) Tranquility GB6 provides an area of quiet tranquility that provides an oasis of calm and a space for quiet reflection. This benefits the well being of residents and aids positive mental health outcomes. (e) Richness of wildlife GB6 contains a valued habitat and is rich with wildlife, including protected species and hosts large areas of trees, hedges and plant life that help support them as well as having a Local Wildlife site within its boundary. Development restrictions on land designated as Local Green Space are strong, similar to the Green Belt, and new development is only permitted in exceptional circumstances. This designation would add remaining protection to the site even if, ultimately, its Green Belt status is removed through the Plan. Local residents and environmental groups are willing to be involved in working with the council to make this a reality, and a modification to include Local Green Space designation for GB6 should be added to the plan.						in the Urban Town Centres Apply flooding and COMAH constraints to reduce allocation on Canvey Green Space Designation for GB6 Removal of Westwood Court Car Park from windfall allocation		

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0298 - 0001	Individual	Alan	Tibbit		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	Not all sites have been considered. No Greenbelt / Grey Belt sites added. Fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply. 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	<u>Consideration of All Sites</u> All reasonable options 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>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Green Belt/Grey belt</u> covered under policy GB2. <u>Flooding and infrastructure</u> covered by policies and supporting	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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																	. Site 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	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.	

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																	infrastructure. The 3,316+ urban homes for Canvey is not resident led.		
0298 - 0002	Individual	Alan	Tibbit		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
0969 - 0001	Individual	Alan	Tibbit		Yes	SP3	No	The whole plan is predetermined. Councillors before election stated in their manifesto documents that No Green Belt would be built on. That is predisposition and is	No	Positively prepared, Effective, Justified, Consistent with national policy	The refusal to use Green belt under any circumstances to appease the few who elected the Councillors goes against all legal requirements, is predetermined by the majority Party PIP and supported by CIIP. On this predetermination alone all of the requirements of producing a fair and equitable Local Plan have been broken.	1. The removal of use of land designated as future industrial expansion land as on Canvey West C4 2. The addition of the North West Thundersl	Yes	Not Answered	Not Answered	A	Flood risk on canvey Evacuation Infrastructure North west thundersley Addition of HO31 - Kings Park Removal of Policy C4	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	N

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								allowed. However to then dismiss ALL Green Belt from the process of fairness and equity in discussion /debate, is not allowed and is predetermination. The Councillors have followed the predisposition they used to get elected and have unfairly, especially with regard to basically dumping 3000+ homes on Canvey West industrial use sites, ignored all flood plain warnings, danger regarding evacuation					ey site 3. The addition of land at Kings Park HO31, which has been removed from previously prepared Plans due to proven Councillor preference, even though it has been surveyed in November 2021 and found to be sound for development, with the additional Site Owner agreeing to build under a s106 agreement, a Doctors Surgery as part of the development.					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. Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/ Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). North West	

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								of residents, for any reason from the Island, and overdevelopment on infrastructure deemed full, as far back as 2014 to protect Mainland Green Belt, especially with regard to North West Thundersley, which despite comments from CPBC stating it was not considered for one reason only, which was ECC refusal to update and provide access. This is in fact a complete fabrication to support their											

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								rhetoric, and now proven by numerous documents, not included in this Local Plan consultation, but unearthed by diligent research. It shows clearly this is not in fact true, as ECC state categorically they will work with any developer on any site to improve/create access by joint negotiations with any developer. To do that however the Land in question has to be submitted as useful development land and plans submitted.											

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								The Council and Councillors were aware of this but chose to ignore this site which is a mixture of Green/Grey Belt and industrial use land, which has none of the problems that the Canvey West proposals have.											
0475 - 0001	Individual	Laura	Tice		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No		All		Castle Point Plan is sound and legally compliant ,	Support noted.	N
0476 - 0001	Individual	Vincent	Tice		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No		All		Castle Point Plan is sound and legally compliant ,	Support noted.	N

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0573 - 0001	Individual	Susan	Tilley		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 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 procedure s	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 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	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.						Need for a third road to be included in the plan.	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 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.	

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																		Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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 capacity of the highway network in	

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																		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. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey,	

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																		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 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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0573 - 0002	Individual	Susan	Tilley		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 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 has been identified through the Open		N

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																		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.	
0573 - 0003	Individual	Susan	Tilley		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
1368 - 0001	Individual	Steven	Tilley			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		No				Policy HOU5 should make provision for improved site environment for the	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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											environment for the local residents.						local residents		
1368 - 0002	Individual	Steven	Tilley			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 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	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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																		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 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.	

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																		Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. 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 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	

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																		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. 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 design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	

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1368 - 0003	Individual	Steven	Tilley			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
1370 - 0001	Individual	Susan	Tilley			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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1370 - 0002	Individual	Susan	Tilley			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 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	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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																		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 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	

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																		why North West Thundersley was not preferred. 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 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	

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
																		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. 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 design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1370 - 0003	Individual	Susan	Tilley			C4					The number of Canvey West homes puts residents in the East		No				Development at West	The safety of all Castle Point residents is a priority	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
											at risk with emergency evacuation procedures						Canvey will impact emergency evacuation procedures for those residents living at East Canvey	and has been considered within the Castle Point Plan	
0854 - 0001	Individual	Craig	Tipper		Yes	HAD4	Yes		No	Positively prepared, Justified, Consistent with national policy	Too many properties proposed on size of site	Reduction in number of properties	No	Not Answered	Not Answered		Density on site HAD4 too much	Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.	N
1185 - 0001	Individual	Julie	Titheradge			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	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	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					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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								n, 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.			appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					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	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 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.	

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																	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>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.	
1185 - 0002	Individual	Julie	Titheradge			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									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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								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.											
1185 - 0003	Individual	Julie	Titheradge			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
1314 - 0001	Individual	Graham	Titheradge			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are		No				Policy HOU5 should make	Comments noted. Policy HOU5 does not restrict	N

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											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.						provision for improved site environment for the local residents	improvement to the sites environment	
1314 - 0002	Individual	Graham	Titherage			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	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	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 common for stepped increases in housing delivery to be set out and agreed in plans,	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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												target of 11,000.					infrastructure.	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 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	

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																		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. 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 capacity of the highway network in and around Castle	

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																		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. 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 design Guide for Essex.	

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																		Canvey SuDS options have been considered through the SFRA.	
1314 - 0003	Individual	Graham	Titheradge			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
1315 - 0001	Individual	Mrs J	Titheradge			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are		No				Policy HOU5 should make	Comments noted. Policy HOU5 does not restrict	N

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											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.						provision for improved site environment for the local residents	improvement to the sites environment	
1315 - 0002	Individual	Mrs J	Titherage			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	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	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 common for stepped increases in housing delivery to be set out and agreed in plans,	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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												target of 11,000.					infrastructure.	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 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	

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																		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. 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 design Guide for Essex.	

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																		Canvey SuDS options have been considered through the SFRA.	
1315 - 0003	Individual	Mrs J	Titheradge			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
0030 - 0001	Individual	Brian	Tobin		Yes	Whole Plan	Yes	I support the Castle Plan Draft and feel it	Yes				Not Stated		No		Castle Point Plan is sound and	Support Noted	N

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								is 'legally compliant' and meets the test of 'soundness', as set out in the National Planning Framework									legally compliant ,		
0031 - 0001	Individual	A	Tobin		Yes	Whole Plan	Yes	I support the Castle Plan Draft and feel it is 'legally compliant' and meets the test of 'soundness', as set out in the National Planning Framework	Yes				Not Stated		No		Castle Point Plan is sound and legally compliant ,	Support Noted	N
1084 - 0001	Individual	Sue	Tomlin		Yes	SP3	No	The infrastructure cannot cope with the number of houses already in the area. The schools , doctors are at capacity. The roads cannot cope with the additional traffic	No	Consistent with national policy	The plans are a tick box exercise to comply with government targets with no thought of improving the infrastructure to support it	The people of Castle Point deserve better our infrastructure cannot cope as it is. The environmental costs outweigh any out of touch government target	No	Not Answered	Not Answered		Infrastructure concerns Traffic Concerns	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	N

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																		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.	
0168 - 0001	Individual	Barbara	Topham		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	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	No		No	A	Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for	Green Belt/Grey belt covered under policy GB2. All reasonable options 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 alternative for allocation) and also the August 2025 North West Thundersley transport evidence.	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

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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. 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,	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. A third road off the Island is a necessity before any such plans should be considered.						7500 homes. 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. Object for proposals for residential on Charfleets	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 ' <i>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'</i>	Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											doctors surgeries and schools which will be required.								
0168 - 0002	Individual	Barbara	Topham		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
0745 - 0001	Individual	Vyki	Towler-Harbo n		Yes	Whole Plan	Yes		Yes	Positively prepared, Effective, Justified, Consistent with national policy			Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant	Support noted.	N
0746 - 0001	Individual	Georgina	Towler-Harbo n		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant ,	Support noted.	N
0727 - 0001	Individual	Jake	Townsend		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/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
0290 - 0001	Individual	DJ	Traer		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 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, should they be forced to move to new premises or have restrictions placed on their	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		Failed to consider strategic alternatives like North West Thundersley No credible five-year housing land supply. 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>Consideration of All Sites</u> All reasonable options 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> covered under policy GB2. <u>Infrastructure</u> Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). <u>Flooding</u> Flood risk covered in policies and the	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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											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.						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	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.	
0290 - 0002	Individual	DJ	Traer		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Age nt?	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	
								emergency evacuation procedures.									with emergency evacuation procedures			
0291 - 0001	Individual	IA	Traer		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 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	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	No		No			Doesn't meet the housing target for Castle Point, Fails to consider strategic alternatives like North West Thundersley. No credible 5 year housing land supply. The site selection ignores green belt / grey belt against new NPPF guidelines . Not all sites have been considered. No green Belt/Grey Belt sites added, specifically	<u>North-West Thundersley</u> 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. <u>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Green Belt</u> Green Belt/Grey belt covered under policy GB2. <u>Reasonable Options</u> All reasonable option sites considered in SLAA and SA. <u>Flooding</u> Flood risk covered in policies and the	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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											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.	Estate site from the plan. Total housing target of 11,000.					y with the exclusion on North West Thundersley. NPPF guide lines state that development should be directed away from areas at highest risk of flooding. Sustainable drainage measures are not appropriate for Canvey Islands unique geography and drainage infrastructure. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500	supporting Strategic Flood Risk Assessment (SFRA). 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. Canvey SuDS options have been considered through the SFRA. <u>Charfleets:</u> 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	

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																	homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleet's Industrial Estate site from the plan. Total housing target of 11,000.		
0291 - 0002	Individual	IA	Traer		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

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
0271 - 0001	Organisation	Stephen	Travis	S&S Vehicle Services	Yes	B8	No		No	Not Stated	We are a local business on the Manor Trading Estate and have had a presence on the estate for years. 1st I record that I have had the opportunity to read and fully understand my neighbour “G&K Groundworks Ltd” Unsound submission. For clarity I attach a copy of G&Ks submission to this e-mail. I record that S&S Vehicle Services agree with G&K Groundworks Ltd.’s in that the regulation 19 draft as presented is Unsound. As relayed in G&K Groundworks Ltd submission 1. CPBC have never engaged with us at S&S about our future of this estate. 2. Have never informed us, as is on the council’s regeneration web page at priority Nr 4 that CPBC intends to build houses on the Manor Trading Estate and move all the businesses on the MTE North of the Borough 3. I presume CPBC intends to Compulsorily purchase my operational property! Again, I have not been consulted at all this is very worrying and concerning. We are certainly more confused now! Where are we going to be re-homed? This Reg 19 along with the recent green belt review indicates that the area North where we are moving to has been identified as GB16 and has been discounted as it is not a viable! option. I would like to record my total disbelief that CPBC along with our local councillors think it’s OK to treat us the MTE business community with total		No		Yes, attached is G&K Groundworks Ltd's response to the consultation		The regulation 19 draft as presented is Unsound. CPBC have never engaged with the business community on Manor Trading Estate. Have never informed as is on the council’s regeneration web page at priority No 4 that CPBC intends to build houses on the Manor Trading Estate and move all the businesses on the MTE North of the Borough I presume CPBC intends to compulso	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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											disrespect. Suffice – I record again that this draft plan is unsound as it has not engaged with the business on the MTE at all. Albeit we are the drivers of the local economy. Perhaps CPBC might remove that Regeneration Priority Frightening Statement and actually support the local business.						rily purchase my operational property! Again, I have not been consulted at all this is very worrying and concerning. Some Background G&K are the title owners of HMLR EX498233 the footprint is 1.22 ha just over 3 acre's which is except for connect packaging the largest single commercial / industrial premises on the Manor Trading Estate. Benfleet Essex. (MTE)		

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																	G&K houses 28 tenants, albeit CPBC are fully aware of those tenants & business as this draft document clearly states CPBC have engaged with them all. For the avoidance of doubt and I engage with all my tenants on a at least a weekly basis not one of them has had any engagement with CPBC officers, councillors nor CPBC co-opted Deyton Bell. Fact this property		

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																	has warehousing & storage buildings along with separate offices and external yards • 10 units have a warehouse footprint of 2400sq ft along with attached offices of 600 sq. ft and associated attached yards of 1200 sq. ft • 3 Units of 1200 sq. ft with 300 sq. ft office & 600 sq. ft of attached rear yard • It has 1 exceptionally large yard of over 20,000 sq. ft which is houses a significant		

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																	14 MW power station that feed the local grid. So, a significant contributor to the local economy. • It has 13 yards ranging from 1250 sq. ft to 5400 sq.ft. We are full to the brim. We continually must turn away enquiries for warehousing and offices. Aside from G&K Groundworks Ltd and its 28 tenants it appears from conversation with other business on the MTE they have not been engaged with. Yet		

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
																	this draft document along with the many website uploads. All indicate that our opinions are reflected in this draft plan. That is not true! Questions over consistency with CPBC Regeneration policies		
0132 - 0001	Individual	Daniella	Tubwhittington		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	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.	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	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	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

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
								West Thundersley. It has no credible five-year housing land supply.			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.						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	considered through the SFRA.	County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	West homes puts residents in the East at risk with emergency evacuation procedures.		
0132 - 0002	Individual	Daniella	Tubwhittington		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

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
0133 - 0001	Individual	Daniella	Tubwhittington		Yes	SP3	No	I am writing to formally object to the proposed development of 3,316 houses on Canvey Island. While I understand the pressure for housing across the region, the scale and location of this proposal raises serious concerns regarding flood risk, transport accessibility, and existing infrastructure capacity. 1. Flood Risk Canvey Island is a low-lying area almost entirely below sea level, relying on flood defences			Without a third road or alternative access route, the proposed development is unsafe and unsustainable, placing future and current residents at unnecessary risk. 3. Infrastructure Constraints Healthcare: Canvey's existing GP surgeries, dental practices, and Southend/ Basildon hospitals are already overstretched. There is no evidence of additional provision to meet the huge demand this development would generate. Education: Local schools are near or at capacity. No concrete plans for new schools or expansions have been presented. Utilities and Drainage: The island's drainage and sewage systems are known to be fragile, with regular surface water flooding after heavy rainfall. Adding thousands more households will overload these systems. Emergency Planning: In a flood or evacuation scenario, current infrastructure could not safely support the island's existing population, let alone an expanded one. 4. Scale and Sustainability The scale of 3,316 houses is disproportionate to the size and capacity of Canvey Island. Sustainable development must balance housing needs with environmental, safety, and community impacts. This proposal fails to meet that balance. Conclusion For the reasons above, I strongly object to the proposed development of 3,316 houses on Canvey Island. The combination of severe flood	I urge the planning authority to reject this proposal or, at minimum, require a full independent review of flood resilience, transport infrastructure (including a third road), and service capacity before any consideration of such a large-scale development.	Not Stated		No		Objects to the proposed development of 3,316 houses on Canvey Island, this proposal raises serious concerns regarding flood risk, transport accessibility, and existing infrastructure capacity. 1. Flood Risk Canvey Island is a low-lying area almost entirely below sea level, relying on flood defences and drainage systems for protection. The Environment Agency classifies	Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure 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. 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	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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								and drainage systems for protection. The Environment Agency classifies Canvey as a high flood-risk zone. Adding 3,316 homes would put thousands more people at risk should sea defences fail or extreme weather events occur. National Planning Policy Framework (NPPF) requires that new developments in flood risk areas demonstrate a robust flood risk assessment and show that risks can be safely managed			risk, inadequate road access, and insufficient infrastructure makes this an unsafe and unsustainable development that would put both new and existing residents at risk.						Canvey as a high flood-risk zone. Adding 3,316 homes would put thousands more people at risk should sea defences fail or extreme weather events occur. National Planning Policy Framework (NPPF) requires that new developments in flood risk areas demonstrate a robust flood risk assessment and show that risks can be safely managed without increasing danger to existing residents. This	Plan. Infrastructure matters, including schools, are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	

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								without increasing danger to existing residents. This proposal does not provide convincing evidence of long-term resilience. Climate change forecasts indicate rising sea levels and more intense rainfall events, which will further increase the risk beyond current predictions. 2. Transport and Access (No Third Road) Canvey Island currently has only two access roads (Canvey Way and Somnes Avenue),									proposal does not provide convincing evidence of long-term resilience. Climate change forecasts indicate rising sea levels and more intense rainfall events, which will further increase the risk beyond current predictions. 2. Transport and Access (No Third Road) Canvey Island currently has only two access roads (Canvey Way and Somnes Avenue), both of which are heavily		

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								both of which are heavily congested at peak times. Emergency services access is already compromised when incidents occur. Adding thousands of households will significantly worsen congestion and response times.									congested at peak times. Emergency services access is already compromised when incidents occur. Adding thousands of households will significantly worsen congestion and response times. Without a third road or alternative access route, the proposed development is unsafe and unsustainable, placing future and current residents at unnecessary risk. 3. Infrastructure Constraints		

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																	Healthcare: Canvey's existing GP surgeries, dental practices, and Southend/Basildon hospitals are already overstretched. There is no evidence of additional provision to meet the huge demand this development would generate. Education : Local schools are near or at capacity. No concrete plans for new schools or expansions have been presented . Utilities and		

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																	Drainage: The island's drainage and sewage systems are known to be fragile, with regular surface water flooding after heavy rainfall. Adding thousands more households will overload these systems. Emergency Planning: In a flood or evacuation scenario, current infrastructure could not safely support the island's existing population, let alone an expanded one.		

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																	4. Scale and Sustainability The scale of 3,316 houses is disproportionate to the size and capacity of Canvey Island. Sustainable development must balance housing needs with environmental, safety, and community impacts. This proposal fails to meet that balance.		
1043 - 0001	Individual	Stephen	Tucker		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant ,	Support noted.	N

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0583 - 0001	Individual	David	Tuggey		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 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 procedure s	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 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	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.						Need for a third road to be included in the plan.	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 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.	

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																		Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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 capacity of the highway network in	

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																		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. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey,	

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																		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 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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0583 - 0002	Individual	David	Tuggey		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 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 has been identified through the Open	N

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																		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.	
0583 - 0003	Individual	David	Tuggey		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
1349 - 0001	Individual	D	Tuggey			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		No				Policy HOU5 should make provision for improved site environment for the	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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											environment for the local residents.						local residents		
1349 - 0002	Individual	D	Tuggey			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 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	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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																		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 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.	

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																		Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. 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 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	

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																		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. 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 design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	

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1349 - 0003	Individual	D	Tuggey			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
0901 - 0001	Organisation	Rosanna	Tunnadine	Habinteg Housing Association	Yes	HOU4	Yes		Yes		As an expert housing provider, we welcome the opportunity to comment on the development of the Castle Point local plan. Habinteg is a housing association that champions inclusion by providing and promoting accessible homes and neighbourhoods that welcome and include everyone. With over 50 years' experience in housing and disability, we manage over 3300 accessible properties across England. We believe that people are disabled by barriers in society and negative public attitudes, rather than by their own impairments. Habinteg strongly supports that the local plan includes accessibility design standards, specifically Building Regulations M4(2) and M4(3). We believe that Policy Hou4 is an exemplary policy that sets a high ambition for providing homes for older and disabled people and avoids ambiguity. 1. All new homes will be		Not Answered	Not Answered	Yes		Supports requirements set out in policy HOU4	Support noted.	N

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											delivered in accordance with accessibility standards as follows: a. 100% of all new homes will be built to standard M4(2); b. 10% of all new homes will be built to standard M4(3). The simple, robust language used alongside clear percentages leaves little room for doubt in the local authority's commitment to accessible and adaptable homes. The ambition is equal to the London Plan which we believe is the strongest accessible housing policy in the country. This approach not only supports inclusive communities but also reduces long-term costs which may otherwise fall to the local authority, for example, stairlift installation in an M4(2) home costs significantly less (£2,500–£4,000) than in a home built before the standards came into effect (£9,000–£10,000). The benefits of M4(2) homes are plentiful, and amongst them, new homes that meet category M4(2) will deliver: • faster hospital discharges • less costly and speedier adaptations when required • reduced local government expenditure on domiciliary care packages by supporting individual independence within the home • delay or avoid moves to more expensive residential care settings • provide a better environment								

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											for ongoing independence when needs change. Mandating 10% of new homes built meet the M4(3) wheelchair user standards will generate significant social and economic value – by reducing reliance on social care, minimising accidents in the home and maximising the potential for disabled people to be economically active and take up employment. (See Habinteg’s 2023 report with London School of Economics: Living not Existing) The benefits of M4(3) homes are plentiful, and amongst them, new homes that meet category M4(3) will deliver: • For a working age wheelchair user, the benefit of living in a wheelchair user home can be valued at around £94,000 over a 10 year period. • For a later years wheelchair user household (aged 65 and over), the benefit could be around £100,000 over a 10 year period. • For a household with a child who is a wheelchair user, the benefit of living in a suitable wheelchair user home could be around £67,000 over a 10 year period. • Removes or reduces the cost of care assistance in the home • Improves confidence, independence, and self esteem • Having a secure and appropriate home enables greater social inclusion and community participation • Reduction in trips and falls in								

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											the home. Policy Hou4 is an excellent accessible housing policy. The Local Plan could play a key role in ensuring that accessible homes are delivered by requiring planning teams to track and report the number of homes approved under the M4(2) and M4(3) standards. This data will support more effective strategic planning and ensure that delivery aligns with local needs. Dwelling mix and quality for older people Considering the wide range of needs experienced by older people the Authority should ensure that the local plan stipulates a proportion of older persons housing, where newly developed, to be designed to fully wheelchair accessible standard. Habinteg also recommends referring would be developers to the recently published 'Inclusive Housing Design Guide' which shows how going beyond the requirements of building regulations can produce even higher quality results that includes consideration of the needs of people with sensory or cognitive impairments and neurodiverse people. Location and context of developments Disabled and older people have told Habinteg about the frustrations and limitations of living in a neighbourhood that offers poor accessibility. This								

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											can reduce the benefits gained from having an accessible home. Factors such as the accessibility of transport provision (not just location), the street scape, provision of drop kerbs, pavement parking rules and the accessibility of local shops and amenities are all important to providing places that are truly liveable which enable people go participate in their local community. Consideration should therefore be given in the local plan as to how the Authority wishes to emphasise the importance of accessibility of the local neighbourhood for any new development, not just proximity.								
0143 - 0001	Individual	Paul	Turmaine		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	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	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	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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character

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								compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			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.						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+	to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	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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																	urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		
0143 - 0002	Individual	Paul	Turmaine		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
1385 - 0001	Individual	Sheila	Turnbull		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. Reference No 25/0778/OUT I am most dissatisfied about the 165 dwellings as this could produce an extra 300 cars to use the already saturated glebelands, Rushbottom Lane and a bottle neck at Tarpots - Schools - Drs Surgery at breaking point.						Castle Point Plan is sound and legally compliant , Concered about a planning applicatio	Support Noted	N

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																	n on Glebelands		
0049 - 0001	Individual	Chris	Turner		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	A	Castle Point Plan is sound and legally compliant ,	Support Noted	N
1033 - 0001	Individual	Nick	Turner		Yes	HAD3	Yes		Yes		Consistent, could be even more joined-up by more closely defining acceptable alternative premises; and related parameters.	Paras 10.24 and 10.25 are logical as far as they go; but could be more vigorously pursued to achieve greater savings and a more harmonious visual landscape. The proposal has clear merits, and these could be	No	Not Answered	Not Answered	A	Expand the site to include Broom House and the Bus Garage Specify that any new facility should have accessible access honour the historic aspect of the existing health facility	The site HAD3 is currently available for development, other sites in the vicinity are not available for development. The site will be masterplanned with regard to the Design policies within the Castle Point Plan including accessible design	N

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												expanded by incorporating a complete redesign of the area to include Broom House and the Bus Garage. The definition of the replacement health facility in Hadleigh, should include ground floor unimpeded access, suitable for pushchairs, wheelchairs and people of all ages with a bus stop on a main route nearby. The current Clinic is an admirable focus of							

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												health resources for Hadleigh, very close to a bus stop and with easy access. It is also an historic asset with a plaque from its opening ceremony ; the replacement facility should therefore incorporate a name signifying its history, and have a blue or purple plaque to commemorate the original act of creating the Hadleigh Clinic as an important Health Centre.							

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0405 - 0001	Individual	Nicola	Turpin		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				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	<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> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	selecticti on 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.	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>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey 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	

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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.	
0405 - 0002	Not Answered	Nicola	Turp		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.						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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0406 - 0001	Individual	Carol	Turpin		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				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	<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> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	selecticti on 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.	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>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey 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	

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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.	
0406 - 0002	Not Answered	Carol	Turpin		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.						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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0867 - 0001	Individual	Vikki	Vafae		Yes	SP3	No	The green belt isn't been considered for building. It's the council's policy to not build on it. So they've planned for over 3000 on Canvey Island, when they're fully aware of how awful the traffic is to get onto Canvey which backs up beyond sadlers farm affecting traffic heading to Benfleet and beyond.	No	Effective, Justified, Consistent with national policy	Refusing to consider Green belt. Unjustly proposing huge numbers on Canvey Island to protect the green belt near the councillors own homes. Some of the plan where businesses are located will never be built on. They've just used those areas to bump up the numbers for building on brownfield sites.	Spread the homes to be built fairly throughout the borough.	No	Not Answered	Not Answered		Infrastructure Transport Third Road onto Canvey 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 Point, including improved linkages to other areas. Growth in Castle Point will facilitate the delivery of the proposals in the Local Transport Plan 4. Third Road onto Canvey		N

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																		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 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	

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																		relevant transport improvement projects identified in the Local Transport Plan.	
0599 - 0001	Individual	Mureen	Vale		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	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	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites	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	N

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											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 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.	target of 11,000.						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.	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 point onwards. For further information please see housing topic paper.	
																	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.			

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																		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. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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	

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																		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. 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.	

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																		Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/ 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 Plan for South Essex specifically identifies	

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																		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.	
0599 - 0002	Individual	Mureen	Vale		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	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 commitments. Full details of the 480 existing commitment can be found within the housing	N

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																	the site environment for local residents	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 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.	

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0599 - 0003	Individual	Mureen	Vale		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
1372 - 0001	Individual	Mureen	Vale			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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1372 - 0002	Individual	Mureen	Vale			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 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	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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																		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 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	

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																		why North West Thundersley was not preferred. 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 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	

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																		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. 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 design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1372 - 0003	Individual	Mureen	Vale			C4					The number of Canvey West homes puts residents in the East		No				Development at West	The safety of all Castle Point residents is a priority	N

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											at risk with emergency evacuation procedures						Canvey will impact emergency evacuation procedures for those residents living at East Canvey	and has been considered within the Castle Point Plan	
0968 - 0001	Individual	Brooke	Vallance		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant ,	Support noted.	N
0084 - 0001	Individual	Debbie	Veal		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	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	No		No		It has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total	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. Other comments noted	N

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											not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					housing target of 11,000.		
0994 - 0001	Agent	Barry	Veater	Govresources Ltd OBO Barry Veater	Yes	SP3	Yes		No	Consistent with national policy	Despite supporting Policy SP2 - Making Efficient Use of Urban Land and Creating Sustainable Places, the Policy SP3 shortfall in projected housing provision of 5466 homes over the plan period, is so far from being consistent with national policy that the Plan is likely to fall very early in the Examination process, if indeed it gets that far. The District is very tightly constrained by water/marshes, protected sites, and Green Belt Land, however a single Green Belt release in NW Thundersley, with appropriate infrastructure and improvements to the remaining Green Belt land warrants more investigation. The potential intensification of urban sites and brownfield development must ensure that sufficient space remains for employment use and commercial space.	Policy SP3 should include one suitable Green Belt site, the least potentially damaging possible site, to raise the likelihood of the Castle Point Plan proceeding to adoption and thereby providing a plan-led approach to development in Castle Point.	No	Not Answered	Not Answered	A	Despite supporting Policy SP2 - Making Efficient Use of Urban Land and Creating Sustainable Places, the Policy SP3 shortfall in projected housing provision of 5466 homes over the plan period, is so far from being consistent with national policy that the Plan is likely to fall very	Noted	N

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																	early in the Examination process, if indeed it gets that far. The District is very tightly constrained by water/marshes, protected sites, and Green Belt Land, however a single Green Belt release in NW Thundersley, with appropriate infrastructure and improvements to the remaining Green Belt land warrants more investigation. The potential intensifica		

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																	tion of urban sites and brownfield development must ensure that sufficient space remains for employment use and commercial space.		
0994 - 0002	Agent	Barry	Veater	Govresources Ltd OBO Barry Veater	Yes	HAD1	Yes		No	Consistent with national policy	Policy Had2 is supported with the exception of a missing ingredient, which is the usability of the resulting town centre for sustainable active travel and for those less able. It is essential that Policy Had2 considers how residents and visitors will move around in the intensified town centre.	Add a criterion, borrowing from T2 - Active travel improvements, to ensure development on e.g. Castle Lane Car Park retains access through the site resulting in an attractive walking/cycling environment to Hadleigh Castle. It is similarly	No	Not Answered			Supports policy HAD2 but suggests that it needs to consider sustainable active travel for all around the town centre	Policy HAD2 does not include the town centre. Policy HAD1 includes improvements to active and sustainable travel options and any development will have to accord with Policies T1-T8 as appropriate.	N

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												important that The Island Site includes safe and accessible crossing points so elderly or infirm residents do not have to walk around the site to reach the facilities beyond it and do not risk crossing without the protection of proper pedestrian crossing points.							
0994 - 0003	Agent	Barry	Veater	Govresources Ltd OBO Barry Veater	Yes	HAD3	Yes		No	Justified	Policy Had3 assumes that the Council is receiving accurate information about the position of the clinic to be surplus to requirements. Criterion 1. of the policy says that the services operating from the facility can be provided elsewhere nearby. What would constitute 'nearby'?	The definition of 'nearby' in criterion 1. should be clearly defined. It would not be acceptable, for example, if the facilities provided at the clinic	No	Not Answered			what constitutes as nearby in relation to the location of the NHS facility	as detailed in the supporting text at paragraph 10.25 reprovision if required will be elsewhere in the Hadleigh area.	N

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												were relocated to Benfleet, making it difficult for those without transport to take advantage of the services provided.							
0994 - 0004	Agent	Barry	Veater	Govresources Ltd OBO Barry Veater	Yes	HAD4	Yes		No	Consistent with national policy	It is unreasonable for children from an infants school to be expected to travel to enhanced playing field facilities elsewhere. A reduction in the site area should be considered to retain sufficient space for children at the school. In addition, parking provision for 114 new homes on the site would create further parking problems on Scrub Lane particularly at the start and end of the school day. The number of homes should be reduced to a single line fronting Scrub Lane.	The depth of the site should be reduced to retain sufficient playing field space for the school and to ensure sufficient space can be provided for residents cars to ensure there is no further spillage of parked cars on to Scrub Lane.	No	Not Answered			Objecting to HAD4: reduce the size of the site to provide extra field provision to the school Parking capacity on scrub lane Development should be one single line	The NPPF at chapter 11 states that policies should promote an effective use of land, therefore by	N

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0425 - 0001	Individual	June	Vincen tJones		Yes	Had2	No	You need to look at alternative areas - out of Hadleigh as we are a grid-lock area already.	No	Justified, consistent with national policy	You are ignoring Greenbelt / Grey areas, brown areas. Why not Thundersley Site. Do not want any housing on the Salvation Army Land - it is farmland, Salvation army want to sell for Housing, they have always been supported locally. As is the need to protect Hadleigh Castle.	Reduce the housing target for this area, particularly Hadleigh/	No			A	Does not support building on HAD2, should consider North West Thundersley instead.	Policy HAD2 does not include any housing development proposals and encourages the use of the area for recreational/agricultural purposes. 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.	N

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0562 - 0001	Individual	Mureen	Waghorn		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 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 procedure s	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 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	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.						Need for a third road to be included in the plan.	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 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.	

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																		Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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 capacity of the highway network in	

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																		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. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey,	

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																		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 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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0562 - 0002	Individual	Mureen	Waghorn		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 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 has been identified through the Open	N

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																		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.	
0562 - 0003	Individual	Mureen	Waghorn		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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0392 - 0001	Individual	Dave	Wahs		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.					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	<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> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	selecticti on 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.	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>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey 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	

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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.	
0392 - 0002	Individual	Dave	Wahs		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.					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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0392 - 0003	Individual	Dave	Wahs		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 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. All; Greenbelt sites on Canvey West need total protection from government intervention. 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. 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	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: Establish firm 2 year timeline for comprehensive lake dredging with dedicated funding and delivery agency. Create annual maintena				A	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 the lake is upheld and will detail who is responsible for this.	N

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											delivery mechanisms and ongoing maintenance commitments. 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 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.	nce dredging schedule with long-term budget allocation . Set measurable targets for lake capacity increase and water quality improvements. Designate responsible agency for ongoing lake management with annual progress reporting and community consultation. COMMUNITY ENGAGEMENT: Engage with Friends of Canvey Lake, a community group, with 2.5k members champion								

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												ing the reset of Canvey Lake to its pre-2010 conditions, to ensure resident-led lake management improvements.							
0160 - 0001	Individual	Bruce	Walford		Yes	Whole Plan	Yes	I support castle point plan regulation draft 19 consultation	Yes		I support castle point plan regulation draft 19 consultation		Not Stated		No	A	Supports the Plan. It is legally sound, well prepared, and in line with national planning policy. It sets out a clear approach for sustainable development across the borough. Evidence is strong, the policies are reasonable, and the proposals are	Support noted.	N

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																	achievable.		
0480 - 0001	Individual	Grace	Walker		Yes	Not Stated	N/A	Not aware of the legal requirements therefore cannot comment	Not Stated		Have not seen the regulations regarding to soundness so cannot comment without sight of some.						Not able to comment without seeing the regs	Noted.	N
0704 - 0001	Individual	Kevin	Walker		Yes	SP3	No	Canvey Island lacks the infrastructure to support this proposed development plan for another 3.5k new dwellings. ☒ 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	No	Positively prepared, Effective, Justified, Consistent with national policy	Not justified or to national policy standards And definitely over development	Definitely over development NW Thundersley has not been considered has a location for all the housing	No	Not Answered	Not Answered		Third Road onto Canvey Flooding on Canvey Infrastructure	Third Road off 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 Essex Local Transport Plan 4, which within the	N

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								roundabout, and current residents often find themselves in traffic jams for extended periods, even in the absence of any incidents. ☒ Canvey Island is already susceptible to flooding. This development would impose an intolerable burden on the current drainage system. ☒ Additional amenities have not been considered, including extra medical practices, dental services, and new senior										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). 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	

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								educational institutions.										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.	
0704 - 0002	Individual	Kevin	Walker		Yes	SP3	No	Canvey Island lacks the infrastructure to support this proposed development plan for another 3.5k new dwellings. ☒ This development would impose a significant burden on the roads for Canvey residents who require access to	No	Positively prepared, Effective, Justified, Consistent with national policy	Over-development to a location that is already saturated with people and lacking the infrastructure for the people that live here already No thought of the North West Thundersley site	Suggestion No further development should take place until an additional road is established as an alternative emergency exit from the Island. ☒ Suggestion: The Blinking Owl site located in North West	No	Not Answered			Third Road onto Canvey Flooding on Canvey Infrastructure	Third Road off 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,	N

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								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. ☒ Canvey Island is already susceptible to flooding. This development would impose an intolerable burden on the current drainage system. ☒ Additional amenities have not been				Thundersley is currently being utilised for industrial purposes. It has good transport links allowing for a substantial allocation of housing without adversely affecting the traffic flow in the remainder of Castle Point.						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. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from	

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								considered , including extra medical practices, dental services, and new senior educational institutions.										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.	
0704 - 0003	Individual	Kevin	Walker		Yes	C9	No	Not all factors have been regarded	No	Positively prepared, Effective, Justified, Consistent with national policy	To build 185+ new homes in this area would cause the loss of small businesses that run at that end of the island as there are no financially viable places for those businesses to move to That end of Canvey Island is already susceptible to flooding. This development would impose an intolerable burden on the current drainage system. Additional amenities have not been considered, including extra medical practices, dental services, and new senior educational institutions.	No further development should take place until an additional road is established as an alternative emergency exit from the Island. Suggestion: The	No	Not Answered			Objecting to 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'. This	N

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												Blinking Owl site located in North West Thundersley is currently being utilised for industrial purposes. It has good transport links allowing for a substantial allocation of housing without adversely affecting the traffic flow in the remainder of Castle Point.						policy will apply until such time as a master plan for West Canvey has been developed. 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.	
0704 - 0004	Individual	Kevin	Walker		Yes	SP3	No	Not justified or to National Policy standards	No	Positively prepared, Effective, Justified, Consistent with national policy	Canvey Island lacks the infrastructure to support this proposed development plan for another 3.5k new dwellings. ☒ 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 any incidents.	Suggestion No further development should take place until an additional road is established as an alternative emergency exit from	No	Not Answered			Third Road onto Canvey Flooding on Canvey Infrastructure	Third Road off 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	N

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											☒ Canvey Island is already susceptible to flooding. This development would impose an intolerable burden on the current drainage system. ☒ Additional amenities have not been considered, including extra medical practices, dental services, and new senior educational institutions.	the Island. Suggestion: The Blinking Owl site located in North West Thundersley is currently being utilised for industrial purposes. It has good transport links allowing for a substantial allocation of housing without adversely affecting the traffic flow in the remainder of Castle Point.							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 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	

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																		Infrastructure Delivery Plan (IDP). 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 relation to Canvey.	

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0754 - 0001	Individual	Yvonne	Walker		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 / Greybelt 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 / 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 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 North West Thundersley site, 187Ha, a greenbelt / greybelt / brownfield 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	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 placed, 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	N

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																		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. 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	

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																		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. 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	

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

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

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0826 - 0001	Individual	Patria	Walker		Yes	SP3	No	This plan has failed to consider strategic alternatives like North West Thundersly. Why not? This is not a credible 5 year housing land supply.	No	Justified, Consistent with national policy	This plan is NOT consistent with national policy. It does NOT meet the housing target for Castlepoint. The site selection ignores greenbelt/ greybelt against NPPF guidelines. The site selection strategy is biased and pre-determined towards a 'no greenbelt build policy'. It is solely based on the 'over development of brownfield sites. It has not considered ALL sites, with no greenbelt/greybelt sites added, and the exclusion of North West Thundersly site, which happens to be the perfect location for development! I do, however, do totally agree with Had2 policy for the Hadleigh Farm area, which states that this site is extremely important for environmental recreational, nature recovery, biodiversity, agricultural farming activities, nature conservation, SSS1, Ramsar site, ecological restoration, habitat creation and connectivity. It provides protection as an open space, promoting our heritage site, Hadleigh Castle, and whatever is planned for this site for the future, it does not have a significant impact on the landscape nor the greenbelt. I also agree the Had2 Policy is about protecting this greenbelt as NOT suitable for development, but the unsound Local Plan for only 6,200 homes puts the Hadleigh Farmland site (GB8), at risk to speculative development, needing planning objections with respect to urban sprawl. IT IS A BUFFER ZONE. The effect on highways, traffic,	You must add North West Thundersly site to the Plan, as 187Ha as a greenbelt/ greybelt site option for 7 500 homes. You must reduce the urban housing target from 6,200 to 3,500, with Canvey at 1,050 homes, and Hadleigh at 305. This is a total of 11,305, which is the amount specified by government.	No	Not Answered	Not Answered		No five year housing land supply North West Thundersly 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 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	N

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											and lack of infrastructure , protecting our Farmland and wildlife are paramount. Development on this Farmland would be out of character, with loss of open space, heritage, archeology sites, and historic links. Greybelt land MUST be used first. Any development on this site affects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support the Had2 Policy with absolutely NO housing development EVER on the Farmland. I am hoping that the Salvation Army agree with taking this direction. We need a C6 Policy for this Farmland site, which is the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.								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 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	

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																		option 4) outlines why North West Thundersley was not preferred. 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 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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																		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. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD3	
0312 - 0001	Individual	Jill	Walsh		Yes	Had4	No	Dear Sir/Madam I do not support the Castle Point Plan Regulation 19 Draft Consultation. It is not legally compliant as it fails to meet the	No	Justified, consistent with national policy	I do not believe this to be an effective, sound or justified policy. Housing density, with a suggested proposal of 114 homes, would be totally out of keeping with the surrounding area. Scrub Lane consists, for the main part, of detached houses with a housing density of 15 dph, totally at odds with the proposed 100dhp. Scrub Lane is a busy road, especially during rush hour and school run times. The proposed development	I believe it is imperative that this plan must introduce the controlled release of some Green Belt on the main land to	Not Stated		No		Policy Had4 Policy: Objects on over-development, highways, local character. Cites mature oak trees on site.	Had4: Noted	N

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								Governments housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.			could potentially add a further 228 motor vehicles entering/exiting the site, leading to and adding to the traffic chaos that occurs every day during the peak times. Scrub Lane is also a well known rat run for vehicles to avoid the High Street. The junction of Scrub Lane/Rectory Road/New Road is traffic light controlled , with normally about six cars exiting Scrub Lane before the lights are against them - queues at peak times often extend back over 200 yards - further traffic will only compound the problem. 10.29 'Pedestrian, cycling and public transport measures connecting to the town centre, nearby facilities and services and Hadleigh Infants and Nursery School will be required. Main vehicular access will be from Scrub Lane.' Public transport measures connecting to town centre ...will not be required and are not viable. The Lane has numerous speed bumps and is not suitable or wide enough to permit the use of buses. The town centre itself is a matter of a five minute walk away. There are a number of mature oak trees on the site, which absorb harmful carbon dioxide to fight climate change, cool the planet by providing shade, prevent soil erosion and flooding with their roots. Together with a long stretch of hedgerow this area provides a home to a large variety of birds and families of foxes (at least two distinct families, each having produced two cubs this year). Nature needs protecting.	reduce significantly the number of houses presently being considered for Canvey Island.								

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											not having their habitat destroyed. There is only one GP practice in Hadleigh which is already struggling to provide appointments for patients. A further potential 228 patients (estimated at a minimum of 2 people per dwelling) would be unsustainable for the practice. This proposal is quite clearly overdevelopment, with a lack of accompanying infrastructure and places enormous pressure on local drainage and sewage.								
0312 - 0002	Individual	Jill	Walsh		Yes	Had1	No		No	Not Stated	HAD1 -Page 66 This policy in my opinion is unsound Further urbanisation of Hadleigh town centre will result in traffic flow coming to a virtual standstill, unless the necessary infrastructure is already in place, which it clearly will not be. The suggestion of development of the Hadleigh Island would seem to suggest the removal of the Library - a community meeting place which is well utilised, not just for borrowing books but also by various groups within the community including the Community fridge, as well as access to computers, printing facilities (again, both well utilised) and would be a great loss to the community.		Not Stated		No		Policy Had1: Objects as unsound and Highways impacts. Concern about possible loss of library. Canvey: Objects to level of development on Canvey. Concerns on access, 2 COMAH sites	Had1: Paragraph 19.39 of the Plan confirms that 'The Council will work closely with ECC to ensure ongoing access to library services for residents'. Part3 of Policy Had1 confirms that community facilities and cultural uses will be included in the scheme. Paragraph 10.16 states there is scope 'to better provide the community uses'.	N

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0312 - 0003	Individual	Jill	Walsh		Yes	SP3	No	Finally, Canvey Island - P38 onwards To suggest the development of over 3,000 dwellings on Canvey Island is unsound and not justified. It is a flood zone 3a area, had one major road to enter/exit the Island and has 2 COMAH sites. There is clearly and unequivocally an imbalance of housing allocation compared to the mainland area in Castle Point, with an obvious bias towards the policy of no building on the Green Belt, to the	No	Not Stated			Not Stated		No		To suggest the development of over 3,000 dwellings on Canvey Island is unsound and not justified. It is a flood zone 3a area, had one major road to enter/exit the Island and has 2 COMAH sites. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. The proposed developments place residents in the east of the Island at risk in the event	Canvey 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. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	N

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								detriment of Canvey Island. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. The proposed developments place residents in the east of the Island at risk in the event of an emergency evacuation procedure. It is ludicrous to suggest that Canvey Island has been allocated this huge amount of development when compared to other areas on the mainland									of an emergency evacuation procedure. I believe it is imperative that this plan must introduce the controlled release of some Green Belt on the mainland to reduce significantly the number of houses presently being considered for Canvey Island. It is ludicrous to suggest that Canvey Island has been allocated this huge amount of development when compared to other areas on		

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																	the mainland		
0547 - 0001	Individual	Shirley	Walsh		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	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	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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											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 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.						homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	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 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		

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																		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. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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	

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																		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. 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. Emergency Evacuation The Councils detailed emergency	

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																		planning pages are here www.castlepoint.gov.uk/emergencyplanning/ 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 Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The	

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																		Local Transport Plans 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.	
0547 - 0002	Individual	Shirley	Walsh		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what makes 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.		Yes			A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves	Thorney 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 commitments. Full details of the 480 existing commitment can be found within the housing	N

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																	the site environment for local residents	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 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.	

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0547 - 0003	Individual	Shirley	Walsh		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.		Yes			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
0547 - 0004	Individual	Shirley	Walsh		Yes	SP3	Not stated		Not stated		I have great concerns about the amount of new properties being proposed to be built on Canvey Island coupled with the lack of support for the well being for the people who live on Canvey now by the Castlepoint Councillors. They seem to have an agenda of their own regarding this issue and it certainly is not for the good of the people of Canvey. The whole infrastructure on Canvey at this moment in time cannot handle what is happening now let alone how it would cope with 3000+ new homes being built. What are they proposing to cater adequately for the problems we are all facing now. 1. Gridlocked Roads Each &	I understand that the Blinking Owl site North West Thundersley is up for grabs. This would allow for 5,000 homes to be built including 20-25% affordable houses. The	Yes			None	I have great concerns about the amount of new properties being proposed to be built on Canvey Island coupled with the lack of support for the well being for the people who live	Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	N

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											Everyday 2. Sewerage, Drainage 3. Evacuation of people off the island to safety (see also point 1) 4. Easier access for all the “Emergency Services” at any time of day to get to where they are needed urgently 5. Road maintenance 6. Doctors, Dentists, Other Health Care Needs 7. Schools, Pre-Schools 8. Policing – Crime (is growing by the day) 9. Upkeep and maintenance of public areas 10. We need far more security cameras & speed cameras installed around the Island now and this has never happened despite the rise in crime, drug dealers and masked kids on electric scooters, anti-social behaviour rife in many areas on the island. All of the above are just some of the main reasons we can pay for a fact that our infrastructure cannot cope now. I dread to think what will happen with 3000+ more homes being built on Canvey. With 6000+ more cars & people adding to the chaos. Which brings me back to the beginning of this letter. What is the hidden agenda of the Castle Point Councillors when the “Blinking Owl Site” proposal would not affect everybody's lives badly in Canvey Island – Benfleet area?	landowners are all totally agreeing to sell this land. It would also mean a new road would be a huge benefit to Canvey & Benfleet area which Dame Rebecca Harris would rush to Parliament & fight the cause and that Essex County Council are on board with and would agree to. In addition to all this future homes after the 5000 for first phase could also be built on the same land					on Canvey now by the Castlepoint Councillors. They seem to have an agenda of their own regarding this issue and it certainly is not for the good of the people of Canvey.		

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												if required. Coupled with all the above private builders (local people & companies would get employment which is badly needed. In my book that is a win-win situation all round so why is Castlepoint Council not on board with this ideal scenario and persist in even considering building on Canvey with all its existing issues and facts of why Canvey Island cannot sustain 3000+							

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												homes being built.							
1420 - 0001	Individual	Janice	Wardle		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
1406 - 0001	Individual	Linda	Warmisham		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. Glebelands 25/0779/Out I do not support the Glebelands plan above as I don't think the infrastructure has been thoroughly thought out there are many reasons to think about. 1) Schools 2) Doctors 3) Shops 4) Traffic at Sadlers farm roundabout, London Road, clare Road, Tarpots, it's already gridlocked in School times and the rush hour 5) Water and Sewerage drains would be under more pressure than they already are we have had several water and sewerage leaks over the past year. They						Castle Point Plan is sound and legally compliant , Concerned about Glebelands planning application and raises some points for refusal.	Support Noted	N

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											only got patched up instead of replacing the whole lots. 6) Pavements are terrible they area trip hazard for everyone. 7) The council can't keep up with things now so what will happen then. 8) Whilst building this development would cause absolute chaos.								
1366 - 0001	Individual	Norman	Warn			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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1366 - 0002	Individual	Norman	Warn			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 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	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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																		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 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	

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																		why North West Thundersley was not preferred. 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 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	

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																		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. 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 design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1366 - 0003	Individual	Norman	Warn			C4					The number of Canvey West homes puts residents in the East		No				Development at West	The safety of all Castle Point residents is a priority	N

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											at risk with emergency evacuation procedures						Canvey will impact emergency evacuation procedures for those residents living at East Canvey	and has been considered within the Castle Point Plan	
0589 - 0001	Individual	Marion	Warron		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	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 towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey	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	N

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											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 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.							west homes put Canvey East homes at risk with emergency evacuation procedures. Need for a third road to be included in the plan. 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. 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	

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																		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. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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;	

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																		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. 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. Emergency Evacuation The Councils	

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																		detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/ 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 Plan for South Essex specifically identifies three projects which will improve accessibility to and	

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																		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.	
0589 - 0002	Individual	Marion	Warron		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	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 commitments. Full details of the 480 existing commitment can be found within the housing	N

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																	the site environment for local residents	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 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.	

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0589 - 0003	Individual	Marion	Warron		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
0034 - 0001	Individual	Norman	Warren		Yes	SP3	Yes	Good afternoon, May I say having read the above, I feel that the council have put together a plan that the people of castle point would say was what they would accept under very difficult circumstances	Yes				Not Stated		No	A	- Government housing numbers are unrealistic and plucked out of thin air, without any knowledge of the areas involved. - The plan is sound. Important to not give in to	Support and concerns noted. - Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). - Flood risk considered in the supporting Strategic Flood Risk Assessment (SFRA). - Wildlife addressed in Policies (particularly ENV1-6) supported by a range of supporting evidence including the Habitats Regulations	N

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								nces. The government has put so much pressure on councils with very unrealistic numbers of homes, with numbers just being plucked out of thin air, without any knowledge of the areas involved, Unfortunately they seem to be on a mission to upset many people at the moment with many policies, The plan is sound, and I thank the councillors for listening to the public opinion at meetings leading up to this time, also the									mounting pressure to avoid the start of a slippery slope. • Concerns with infrastructure, flood risk, wildlife, heritage and the threat of urban sprawl.	Assessment, Local Wildlife Site Review, South Essex Green and Blue Infrastructure Study, Essex Local Nature Recovery Strategy, Living Landscape reports, Biodiversity Report , Strategic Biodiversity Assessment. • Heritage protected by Policy D9 Conserving and Enhancing the Historic Environment	

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								planning department for their extreme effort under the most difficult pressure put on them at this time. With all that said, I think that this is a time when the councils and public have got to be very brave and resilient, and do not give in to mounting pressure that will come without any foundation whatsoever. If we are not strong together, the outcome for the council, councillors, and residents will be the start of a slippery											

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								slope that does not end well. Everything has been said regarding the roads, One accident, gridlock. For every dwelling built, usually two cars, extra service supply for more households, water, sewage etc. Hospitals, Doctors, Schools etc, already under increasing pressure, Also flood risks in the borough, and damage to the environment. The History of Hadleigh, The Greenbelt, The farmland in around The Castle,											

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								and surrounding area, ie the Salvation Army land, is what brings people to our borough to see on their visits, with nature, wildlife, and again the history , bringing extra income to local businesses , Finally I think that turning areas of beauty and history, into urban sprawl is a disaster that can never be made right, You do not have to go too far or look elsewhere to know exactly what can happen when it is uncontest											

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								ed. We all need to be together and most resilient in this most important issue, which will affect us and our children's life forever, Thankyou, Norman Warren, and if I can add my wife Denise Warren to these comments , which she agrees with.											
0035 - 0001	Individual	Denise	Warren		Yes	SP3	Yes	Good afternoon, May I say having read the above, I feel that the council have put together a plan that the people of castle point would say was what they would accept under very difficult circumsta	Yes				Not Stated		No		- Government housing numbers are unrealistic and plucked out of thin air, without any knowledge of the areas involved. - The plan is sound. Important to not give in to	Support and concerns noted. - Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). - Flood risk considered in the supporting Strategic Flood Risk Assessment (SFRA). - Wildlife addressed in Policies (particularly ENV1-6) supported by a range of supporting evidence including the Habitats Regulations	N

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								nces. The government has put so much pressure on councils with very unrealistic numbers of homes, with numbers just being plucked out of thin air, without any knowledge of the areas involved, Unfortunately they seem to be on a mission to upset many people at the moment with many policies, The plan is sound, and I thank the councillors for listening to the public opinion at meetings leading up to this time, also the									mounting pressure to avoid the start of a slippery slope. • Concerns with infrastructure, flood risk, wildlife, heritage and the threat of urban sprawl.	Assessment, Local Wildlife Site Review, South Essex Green and Blue Infrastructure Study, Essex Local Nature Recovery Strategy, Living Landscape reports, Biodiversity Report , Strategic Biodiversity Assessment. • Heritage protected by Policy D9 Conserving and Enhancing the Historic Environment	

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								planning department for their extreme effort under the most difficult pressure put on them at this time. With all that said, I think that this is a time when the councils and public have got to be very brave and resilient, and do not give in to mounting pressure that will come without any foundation whatsoever. If we are not strong together, the outcome for the council, councillors, and residents will be the start of a slippery											

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								slope that does not end well. Everything has been said regarding the roads, One accident, gridlock. For every dwelling built, usually two cars, extra service supply for more households, water, sewage etc. Hospitals, Doctors, Schools etc, already under increasing pressure, Also flood risks in the borough, and damage to the environment. The History of Hadleigh, The Greenbelt, The farmland in around The Castle,											

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								and surrounding area, ie the Salvation Army land, is what brings people to our borough to see on their visits, with nature, wildlife, and again the history , bringing extra income to local businesses , Finally I think that turning areas of beauty and history, into urban sprawl is a disaster that can never be made right, You do not have to go too far or look elsewhere to know exactly what can happen when it is uncontest											

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								ed. We all need to be together and most resilient in this most important issue, which will affect us and our children's life forever, Thankyou, Norman Warren, and if I can add my wife Denise Warren to these comments , which she agrees with.											
0738 - 0001	Organisation	Roy	Warren	Sport England	Yes	Fore word	Yes		Yes		Support is offered for the proposed vision in terms of green spaces, community buildings and other community spaces delivering health and wellbeing outcomes. This vision would accord with Government policy in paragraph 96(c) of the NPPF and Sport England's 'Uniting the Movement' Strategy https://www.sportengland.org/about-us/uniting-movement		Not Answered	Not Answered	Not Answered	A	Support is offered for the proposed vision in terms of green spaces, community buildings and other community spaces delivering health and wellbeing outcomes	Support noted.	N

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0738 - 0002	Organisation	Roy	Warren	Sport England	Yes	Fore word	Yes		Yes		Objectives 2, 3, 17 and 19 are supported as these objectives would support the provision of opportunities for sport/physical activity and encourage active environments. These objectives would be consistent with Sport England's Planning for Sport objectives https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=planning_for_sport_guidance and Government policy in paragraph 96(c) of the NPPF.		No	Not Answered		A	Objectives 2, 3, 17 and 19 are supported as these objectives would support the provision of opportunities for sport/physical activity and encourage active environments.	Support noted.	N
0738 - 0003	Organisation	Roy	Warren	Sport England	Yes	SP1	Yes		Yes		The policy is supported due to its focus on protecting and enhancing the Borough's green and blue infrastructure to support health and wellbeing including physical activity. The policy would be consistent with Sport England's Planning for Sport objectives https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=planning_for_sport_guidance and Government policy in paragraph 96(c) and 104 of the NPPF.		No	Not Answered		A	Supports SP1 and the protection and enhancement of GBI to support wellbeing accords with Sport England Planning for Sport guidance and paragraph 96(c) NPPF	Support noted.	N
0738 - 0004	Organisation	Roy	Warren	Sport England	Yes	SP2	Yes		Yes		The policy is supported, especially part 3 because the requirements would support the creation of active environments that would encourage physical		No	Not Answered		A	Supports SP2 and creation of active environm	Support noted.	N

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											activity through the planning and design of development. The policy would be consistent with Sport England's Active Design guidance https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design and Government policy in paragraph 96(c) and 129 of the NPPF.						ents, accords with Sports England Planning for Sport guidance and paragraph 96(c) of NPPF		
0738 - 0005	Organisation	Roy	Warren	Sport England	Yes	SP4	Yes		Yes		The policy is supported as it would help ensure that infrastructure requirements arising from development including facilities that support community sport and physical activity are provided to meet the additional demands created by new developments. The specific reference in paragraph 6.62 of the reasoned justification to sports facilities as a type of infrastructure that is needed is welcomed in this context. The Council's evidence base including the Playing Pitch Strategy and Built Facilities Strategy would support the inclusion of community sports facility provision as an infrastructure type that is needed to support development and would accord with Government policy in paragraph 103 of the NPPF.		No	Not Answered		A	The policy is supported as it would help ensure that infrastructure requirements arising from development including facilities that support community sport and physical activity are provided to meet the additional demands created by new developments. The specific	Support noted.	N

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																	reference in paragraph 6.62 of the reasoned justification to sports facilities as a type of infrastructure that is needed is welcomed in this context		
0738 - 0006	Organisation	Roy	Warren	Sport England	Yes	B9	Yes		Yes		The principle of masterplanning South Benfleet Playing Fields as a multi-functional green space is welcomed as this would encourage sport and physical activity to take place. Criterion 5 is particularly welcomed as it will help ensure that the existing playing pitches which make an important contribution to its multi-functional role are not lost or prejudiced by future proposals. This would be consistent with Government policy in paragraph 104 of the NPPF.		No	Not Answered		A	Supports B9 for the redevelopment of South Benfleet Playing fields to create a multifunctional green space without overall loss of existing playing pitch provision.	Support noted.	N
0738 - 0007	Organisation	Roy	Warren	Sport England	Yes	HAD4	Yes		Yes		Land south of Scrub Lane (Ref: 318) was land last used as a playing field albeit many years ago. The site was allocated in the previous Local Plan that was not adopted. Sport England's position on this allocation when consulted in the past was that based on the individual		No	Not Answered		A	Supports the development of Land South of Scrub Lane with the	Support noted.	N

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											circumstances of the site (including the limited size of the site and the lack of ancillary facility infrastructure) the principle of development would be acceptable if mitigation could be secured in the form of an appropriate financial contribution in lieu of direct replacement playing field provision that could be used towards new or enhanced playing field provision in the Borough. This is justified due to the deficiencies identified in the Council's Playing Pitch Strategy as the site could be brought back into use to help address these deficiencies. The requirement in part 5 of the policy (and paragraph 10.30 of the reasoned justification) for the loss of playing field land to be mitigated by an appropriate financial contribution towards new or enhanced playing fields nearby is therefore supported. This requirement is considered to be necessary to ensure that the policy accords with the Council's evidence base (Playing Pitch Strategy) and Government policy in paragraph 104 of the NPPF.						appropriate financial contribution towards new or enhanced playing fields within the locality.		
0738 - 0008	Organisation	Roy	Warren	Sport England	Yes	THUN 2	Yes		Yes		The site contains strategically important community sports facilities that serve the Thundersley, Benfleet and Hadleigh areas of the Borough namely the Runnymede Leisure Centre and USP College. The requirement in part 1 of the policy (and paragraph 11.12 of the reasoned justification) re-provide the community uses with equivalent or better		No	Not Answered		A	Runnymede Leisure Centre and USP College provide strategically important community sports facilities	Support noted.	N

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											provision either on-site or off-site is welcomed as this should ensure that any future proposals that require the redevelopment of these facilities will make provision for their replacement. This would accord with the Council's evidence base (Playing Pitch Strategy and Built Facilities Strategy) and Government policy in paragraph 104 of the NPPF.						for Thundersley, Benfleet and Hadleigh. Supports Part 1 of policy Thun 2 for the provision of equivalent or better on or offsite facilities as part of the redevelopment of this site.		
0738 - 0009	Organisation	Roy	Warren	Sport England	Yes	D1	Yes		No	Positively prepared, Consistent with national policy	In view the Local Plan's vision and strategic objectives relating to delivering health and wellbeing outcomes to enable more active and healthier lifestyles for residents, it is surprising that a design objective does not encourage development to be designed to encourage physical activity. While reference to Sport England's Active Design is made later in the plan in paragraph 16.34 of the reasoned justification to Policy D2, there is no specific objective in the design principles policy. As well as positively responding to the Local Plan's vision and objectives, the inclusion of an additional objective to address this matter would allow the policy to be consistent with paragraphs 96(c and 129(e of	To address this, it is requested that an additional design objective is included in Policy D1 along the following lines: "Maximise opportunities for encouraging physical activity"	No	Not Answered		A	In view the Local Plan's vision and strategic objectives relating to delivering health and wellbeing outcomes to enable more active and healthier lifestyles for residents, it is surprising that a design	Noted, see modifications	Modification to Policy D1 p. Maximise opportunities for encouraging physical activity. Modification to paragraph 16.28 Developments have the potential to improve accessibility and local permeability by making places that connect with each other and

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											the NPPF as well as the Active Design guidance. An objection is therefore made to the Local Plan in its current form as it would not be considered to meet the 'positively prepared' or 'consistent with national policy' tests of soundness	It is also requested that the reasoned justification then provides a short explanation of the importance of designing developments to encourage physical activity and that Sport England's Active Design guidance is signposted to for detailed advice on how this can be achieved in practice.					objective does not encourage development to be designed to encourage physical activity. While reference to Sport England's Active Design is made later in the plan in paragraph 16.34 of the reasoned justification to Policy D2, there is no specific objective in the design principles policy. As well as positively responding to the Local Plan's vision and objectives, the inclusion of an additional objective		are easy to move through. This also encourages the use of active travel and encourages physical activity. Promoting legibility through development helps to provide recognisable routes, intersections and landmarks to help people find their way around; and make faster journeys. Sport England have also developed 'ten principles to inform active design' which provide guidance on how the design of environments can help people lead more physically

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																	to address this matter would allow the policy to be consistent with paragraphs 96(c and 129(e of the NPPF as well as the Active Design guidance. An objection is therefore made to the Local Plan in its current form as it would not be considered to meet the 'positively prepared' or 'consistent with national policy' tests of soundness. To address this, it is requested that an		active and healthy lives.

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																	additional design objective is included in Policy D1 along the following lines: "Maximise opportunities for encouraging physical activity" It is also requested that the reasoned justification then provides a short explanation of the importance of designing developments to encourage physical activity and that Sport England's Active Design guidance is signposted to for detailed advice on		

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																	how this can be achieved in practice.		
0738 - 0010	Organisation	Roy	Warren	Sport England	Yes	INFRA 3	Yes		No	Positively prepared, Consistent with national policy	In view the Local Plan's vision and strategic objectives relating to delivering health and wellbeing outcomes to enable more active and healthier lifestyles for residents, it is surprising that the policy does not go beyond the focus on providing conventional health infrastructure and also cover preventative health measures. In particular, a health and wellbeing policy in a Local Plan would be expected to require developments to be planned and designed to support physical activity and thereby encourage healthy lifestyles. As well as positively responding to the Local Plan's vision and objectives, the inclusion of an additional requirement to address this matter would allow the policy to be consistent with paragraphs 96(c and 129(e of the NPPF. An objection is therefore made to the policy in its current form as it would not be considered to meet the 'positively prepared' or 'consistent with national policy' tests of soundness.	To address this, it is requested that an additional requirement is included in Policy Infra3 along the following lines: "Expecting developments to be planned and designed to encourage more active and healthier lifestyles" It is also requested that the reasoned justification then provides a short explanation of the	No	Not Answered		A	In view the Local Plan's vision and strategic objectives relating to delivering health and wellbeing outcomes to enable more active and healthier lifestyles for residents, it is surprising that the policy does not go beyond the focus on providing conventional health infrastructure and also cover preventative health measures . In particular, a health	See modifications proposed	Modification to Policy Infra3 (to be inserted as f. and subsequent renumbering) f. Expecting all development proposals to be planned and designed to encourage more active and healthier lifestyles; New paragraph to be added to Reasoned Justification after 19.50 Designing developments to promote active and healthier lifestyles is central to creating sustainable communiti

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												importance of planning and designing developments to encourage more active and healthier lifestyles. Sport England's Active Design guidance can be signposted to for detailed advice on how this can be achieved in practice.					and wellbeing policy in a Local Plan would be expected to require developments to be planned and designed to support physical activity and thereby encourage healthy lifestyles. As well as positively responding to the Local Plan's vision and objectives, the inclusion of an additional requirement to address this matter would allow the policy to be consistent with paragraphs 96(c and 129(e of the NPPF.		es. Incorporating walking, cycling, green spaces, and accessible sports facilities encourages daily activity, supports wellbeing, and reduces car dependency. Development proposals should have regard to the Sport England Active Design Guidance.

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																	An objection is therefore made to the policy in its current form as it would not be considered to meet the 'positively prepared' or 'consistent with national policy' tests of soundness. To address this, it is requested that an additional requirement is included in Policy Infra3 along the following lines: "Expecting developments to be planned and designed to encourage more		

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																	active and healthier lifestyles” It is also requested that the reasoned justification then provides a short explanation of the importance of planning and designing developments to encourage more active and healthier lifestyles. Sport England’s Active Design guidance can be signposted to for detailed advice on how this can be achieved in practice.		
0738 - 0011	Organisation	Roy	Warren	Sport England	Yes	INFRA 4	Yes		Yes		The policy is supported (especially part 2 and 4) as it supports the protection of open space including playing pitches unless suitable criteria are met. The policy would be considered		No	Not Answered		A	Supports INFRA4 and its protection of open space and	Support noted.	N

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											to be justified by the Council's evidence base for sport (Playing Pitch Strategy) and paragraphs 103 and 104 of the NPPF and Sport England's Planning for Sport Guidance and Playing Fields Policy https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=planning_for_sport_guidance						playing pitches		
0738 - 0012	Organisation	Roy	Warren	Sport England	Yes	INFRA 5	Yes		Yes		The policy and its reasoned justification are supported as it supports the protection of indoor sports facilities and securing provision for additional or enhanced indoor sports facilities and outdoor sports facilities/playing pitches in new development. The policy and reasoned justification would be considered to be justified by the Council's evidence base for sport (Playing Pitch Strategy and Built Facilities Strategy) and paragraphs 103 and 104 of the NPPF and Sport England's Planning for Sport Guidance https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=planning_for_sport_guidance		No	Not Answered		A	Supports INFRA5 and the protection of and provision of enhanced indoor sports facilities	Support noted.	N
0738 - 0013	Organisation	Roy	Warren	Sport England	Yes	T1	Yes		Yes		The policy is supported due to its focus on supporting sustainable and active travel modes which will encourage physical activity. In particular, part 2 of the policy (and paragraph 20.10 of the reasoned justification) is supported as this requires new development to be designed using active design principles so that people can walk, cycle and wheel in their local area with ease. The policy		No	Not Answered		A	The policy is supported due to its focus on supporting sustainable and active travel modes which will	Support noted.	N

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											would be considered to accord with Government policy in paragraph 96(c) of the NPPF.						encourage physical activity. In particular, part 2 of the policy (and paragraph 20.10 of the reasoned justification) is supported as this requires new development to be designed using active design principles so that people can walk, cycle and wheel in their local area with ease		
0738 - 0014	Organisation	Roy	Warren	Sport England	Yes	T3	Yes		Yes		The policy is supported due to its focus on measures that will support active travel improvements which will encourage physical activity. In particular, part 5 of the policy is supported as this would support active travel routes through public open spaces which would provide opportunities for people to be active when they are travelling to open spaces where they will participate in physical		No	Not Answered		A	The policy is supported due to its focus on measures that will support active travel improvements	Support noted.	N

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											activity. The policy would be considered to accord with Government policy in paragraph 96(c) of the NPPF.						which will encourage physical activity. In particular, part 5 of the policy is supported as this would support active travel routes through public open spaces which would provide opportunities for people to be active when they are travelling to open spaces where they will participate in physical activity		

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1256 - 0001	Individual	Pamela	Warren			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1256 - 0002	Individual	Pamela	Warren			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1256 - 0003	Individual	Pamela	Warren			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
0775 - 0001	Individual	Jaz	Wasson		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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1195 - 0001	Individual	Barbara	Waters			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1195 - 0002	Individual	Barbara	Waters			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1195 - 0003	Individual	Barbara	Waters			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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0062 - 0001	Individual	Matt hew	Watson		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	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	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 vulnerability	Not Stated		No	A	Objections on: • 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	• Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • 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. • Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation	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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								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			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 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)	ities, 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. Essex County Council is investing in infrastructure and would be legally obliged to						measure identified but theoretical rather than practical. • Canvey: Concerns over flood risk. SUDS must be designed with a full understanding of Canvey’s unique drainage context. • Green Belt: Welcome decision not to include green belt sites. • North West Thundersley should have been included.	to Canvey. 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 also have been considered through the the SFRA.	

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								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			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 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	cooperate . North West Thundersley offers a strategic opportunity for sustainable growth.							

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								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			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,								

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								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 constructiv				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. 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							

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								e 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			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, 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								

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								ire 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			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 demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous								

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								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 undermini			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 Fairglens 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,								

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								ng 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			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								

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								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.			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. 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								

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								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			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.								

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								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;											

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								they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											
0062 - 0002	Individual	Matt hew	Watson		Yes	Forword	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful	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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								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											

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								risks being found unsound on procedural grounds alone.											
0063 - 0001	Individual	Rosalyn	Watson		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.	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	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	Not Stated		No	A	Objections on: • 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	• Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • 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.	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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								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			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 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	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. Essex County Council is					implementation pathways to address NPPF 180. Mitigation measures identified but theoretical rather than practical. • Canvey: Concerns over flood risk. SUDS must be designed with a full understanding of Canvey's unique drainage context. • Green Belt: Welcome decision not to include green belt sites. • North West Thundersley should have been included.	• Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. 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 also have been considered through the the SFRA. Comments noted. • 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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								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			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 discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The	investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.							

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								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			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 as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised								

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								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			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. 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								

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								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			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, 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								

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								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			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 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								

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								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 demonstra			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 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								

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								ble 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			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, 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								

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								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			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 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								

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								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			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 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.								

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								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											

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								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.											
0063 - 0002	Individual	Rosalyn	Watson		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	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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								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											

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								risks being found unsound on procedural grounds alone.											
0087 - 0001	Individual	Christina	Watson		Yes	SP3	No	I DO NOT consider the draft plan to be legally compliant. Reason: Failed to consider strategic alternatives like North West Thundersley. 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, with the exclusion of North West Thundersley. NPPF guidelines state that 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 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATIONS: Add North West Thundersley site, 187Ha, a Greenbelt /Grey Belt/Brownfield site option. I consent to my full name being published alongside my comments for this consultation.	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	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 and respond to site circumstances and have regard to the	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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																	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	ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	

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																	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		

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																	target of 11,000.		
0087 - 0002	Individual	Christina	Watson		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Justified, consistent with national policy			No		No		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
0088 - 0001	Individual	Roy	Watson		Yes	SP3	No	I DO NOT consider the draft plan to be legally compliant. Reason: Failed to consider strategic alternatives like North West Thundersley. 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, with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique	PROPOSED MODIFICATIONS: Add North West Thundersley site, 187Ha, a Greenbelt /Grey Belt/Brownfield site option. I consent to my full name being published alongside my comments for this consultation.	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	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	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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											geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						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	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).

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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		

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																	evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.		
0088 - 0002	Individual	Roy	Watson		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Justified, consistent with national policy			No		No		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
0163 - 0001	Individual	Brenda	Watson		Yes	Whole Plan	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	No	Justified, Consistent with National policy			Not Stated		No		Doesn't support the Castle Point Plan Regulation 19 Draft Consultation. Doesn't consider the draft plan to be legally compliant Reason: The draft local plan	Noted	N

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								Reason: The draft local plan is not justified and consistent with national policy.									is not justified and consistent with national policy.		
0842 - 0001	Individual	Andrea	Watt		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, 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 towards a "no greenbelt build policy", is solely 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. 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. The Had2 policy is about protecting this greenbelt site as not suitable for development,	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	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 common for stepped increases in housing	N

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											but an unsound plan 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 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 policy Had2 with no housing development ever on this farmland site. We need a C6 Policy for this farmland, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.								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 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	

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																		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. 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	

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																		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. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD3	

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0021 - 0001	Individual	Samantha	Watts		Not Stated	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	No		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	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	Not Stated		No		Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • 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	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 • 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. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery	N

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								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			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 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)	ities, 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. Essex County Council is investing in infrastructure and would be legally obliged to					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.	mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								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			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 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	cooperate . North West Thundersley offers a strategic opportunity for sustainable growth.							

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								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			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,								

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								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 constructiv				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. 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							

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								e 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			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, 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								

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								ire 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			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 demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous								

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								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 undermini			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 Fairglens 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,								

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								ng 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			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								

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								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.			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. 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								

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								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			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.								

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								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;											

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								they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											
0021 - 0002	Individual	Sam antha	Watts		Not Stated	Forword	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful	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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								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											

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								risks being found unsound on procedural grounds alone.											
0863 - 0001	Individual	Peter	Watts		Yes	HAD4	No	The proposed number of 114 new homes being considered to be built, on such a small parcel of land, in an already tight and overpopulated area, is totally impractical. Please see attached, a brief snap-shot of pictures, reflecting the present and ongoing parking situation for the Conifers - which presumably, will only get worse - once the	No	Effective	Ticked this box only because a "none" box option was not offered. This area is totally unsuitable and cannot reasonably be considered to cope with the extra traffic, parking and already saturated traffic flows being experienced NOW. It is impossible to now travel along Scrub Lane - at any time of day (or night) - due to the extra parked cars along the Lane. As an example: The area around Scrub Mews - where there used to be one Bungalow - but now something like 12 + houses have been built - has produced parked cars from Bilton Road to Seymour Road - always a block of 9/10 vehicles on the south side of Scrub Lane - presumably the overspill of Scrub Mews residence. If you then take a moment to think of the times when Parents are dropping off/picking up young ones to the Infant school - the increased volume of traffic along Scrub Lane with the rush-hour increased volumes - pretty much grid-locks Scrub Lane and the traffic lights phasing further enhances that delay. As a long time resident [REDACTED Personal Information] ; this issue does	The only necessary consideration with this site: This land should never have been proposed be built on, in the first instant.	No	Not Answered	Not Answered	B	Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane 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. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).		N

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								school's twice daily, drop-off/collect on traffic, lose the present kirb side parking on Scrub Lane and parents look to park as close to the school as possible - which inevitably are the Greenacres and Conifers roads. Finally: the situation regarding the closure of our Doctors' Surgery in Rectory Road - "The Hollies" - is of great concern; and despite having received an email from a no-reply.accum			make it more difficult to get in and out of the Conifers. In addition - and as an example - to the growing parking/congestion issue - The Conifers now has a constant amount of commercial vans and cars being parked overnight and during the day - along the west side of our street, from residents who do not live here. This makes entering the street more difficult and not a great help to our excellent refuse collectors.								

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								rx3@nhs.net, on 21/11/2025, advising of the services available, the Surgery, it appears, is not in a position to hold in-house GP consultations, and it's not looking like they ever will - under the current circumstances, as the email states face-to-face appointments, at nearby sites ! This situation, hopefully, will be duly noted, therefore - along with the pending traffic problems - that we can't cope now and											

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								provide services for the existing population and really, this should all be rectified, before any increase in the housing population is further considered for this area.											
1197 - 0001	Individual	Jill	Watts			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	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					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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			3316 urban homes for Canvey is not resident led	the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					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	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 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	

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																	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	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.	
1197 - 0002	Individual	Jill	Watts			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.											
1197 - 0003	Individual	Jill	Watts			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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0051 - 0001	Individual	John	Webb		Yes	SP3	No		No	Not stated	I wish to formally object to the proposed housing development on Canvey Island, under the current draft of the Castle Point Borough Council (CPBC) Local Plan. This objection is based on both personal and local community safety concerns, particularly the failure to properly make and apply provisions of the Civil Contingencies Act Emergency Planning Requirements Flood Risk I write as long-term residents of Canvey Island, being a survivor of the disastrous 1953 flood, I feel entitled to state that if CPBC's Regulation 19 Draft Plan proceeds without site-specific, consequence modelling in terms of flood risk, it risks repeating history under the illusion of modernity. A similar event today given the population growth on Canvey Island will have a much greater catastrophic outcome. Major-Hazardous Installations and Associated Port Facilities REDACTED which increases our vulnerability when faced with emergencies. Our home lies within the consultation distance of COMAH-designated hazardous sites and despite the legal obligations under the Control of Major Accident Hazards (COMAH) Regulations and the Civil Contingencies Act (CCA), we have never received any formal communication regarding emergency planning guidance tailored to our circumstances. We are unaware of evacuation routes, shelter provisions, or how our health		Not Stated		No	A	Objects to the proposed housing development on Canvey Island, under the current draft of the Castle Point Borough Council (CPBC) Local Plan. This objection is based on both personal and local community safety concerns, particularly the failure to properly make and apply provisions of the Civil Contingencies Act Emergency Planning Requirements Flood Risk I write as long-term residents of Canvey Island,	Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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											needs would be accommodated in the event of a major incident. The failure to warn and inform is not just a procedural oversight-it is a breach of our fundamental rights under the Human Rights Act 1998, particularly Article 2 (Right to Life) and Article 8 (Right to Private and Family Life). Hazard Range Consequence. We are acutely aware that emergency planning fails to provide for the known consequence identified via the Safety Reports of the Oikos and Calor Gas Installations. The ramification of which are not remotely accounted for in terms of human harm, how badly and how many are living and working within the Hazard Range. Vulnerable Communities We are deeply concerned that: Specific emergency plans are generally not known amongst the community. Many of which reside it Park Home retirement dwellings, being completely inappropriate for situations of serious flooding or industrial accidents. Failure to provide public information under COMAH Regulation or the CCA's duty to warn and inform is of huge concern. The vulnerabilities of a young and aging community have been ignored in all local resilience planning, despite clear statutory duty obligations. Conclusion Whilst the Castle Point Plan 2026-2043 does acknowledge flood risk and the presence of major industrial hazards-							being a survivor of the disastrous 1953 flood, I feel entitled to state that if CPBC's Regulation 19 Draft Plan proceeds without site-specific, consequence modelling in terms of flood risk, it risks repeating history under the illusion ofmodernity. A similar event today given the population growth on Canvey Island will have a much greater catastrophic outcome.		

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											especially on Canvey Island-it arguably falls short of fully articulating how increased population density could amplify the consequences of such risks. We urge the Planning Inspector to consider whether this plan is truly "sound" or "legally compliant" when it fails to integrate consequence-based emergency planning compounded by access and egress issues. The plan omits viable alternative sites outside of Flood Zone 3 and COMAH Site Hazard Range whilst actively selecting its primary housing site in the already urbanised at risk environment of Canvey Island.									
0055 - 0001	Individual	Lynda	Webb		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	Yes				Not Stated		No	A	Supports the Plan Draft and feel it is 'legally compliant' and 'sound'. I feel the need to keep our green belt/grey belt essential. Please do not destroy these areas that are beneficial to the	Support noted.	N	

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								alongside my comments for this consultation. I feel the need to keep our green belt/grey belt essential. Please do not destroy these areas that are beneficial to the health of our community and to wildlife alike. Thank you for reading this plea.									health of our community and to wildlife alike.		
0115 - 0001	Individual	Laura	Webb		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	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	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	B - see 0115-0003	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predeter	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	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

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								consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			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.						mined 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	ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	e 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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																	not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		
0115 - 0002	Individual	Laura	Webb		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	B - see 0115-0003	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
0115 - 0003	Individual	Laura	Webb		Yes	SP3	Not Stated		Not Stated	Not Stated	I completely object to any further building in any area of castle point!! And if you guys can't see his ridiculous this is you shouldn't be doing this job! Add in the " we've made an error" is absolutely laughable!!! I COMPLETELY OBJECT TO ANY BUILDING IN THE AREA!!!!!!		Not Stated		No	None	Completely objects to further building in Castle Point	Noted	N
1049 - 0001	Individual	Pamela	Webb		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally	Support noted.	N

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																	compliant ,		
1222 - 0001	Individual	Susan	Webb			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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. <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	

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																	proposed 3316 urban homes for Canvey is not resident led	considered through the SFRA.	
1222 - 0002	Individual	Susan	Webb			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1222 - 0003	Individual	Susan	Webb			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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1223 - 0001	Individual	Maggie	Webb			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1223 - 0002	Individual	Maggie	Webb			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1223 - 0003	Individual	Maggie	Webb			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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0592 - 0001	Individual	Alexandra	Webber		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 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 procedure s	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 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	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.						Need for a third road to be included in the plan.	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 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.	

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																		Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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 capacity of the highway network in	

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																		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. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey,	

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																		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 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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0592 - 0002	Individual	Alexandra	Webber		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 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 has been identified through the Open	N

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																		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.	
0592 - 0003	Individual	Alexandra	Webber		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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1154 - 0001	Individual	Roger	Webber			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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1154 - 0002	Individual	Roger	Webber			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1154 - 0003	Individual	Roger	Webber			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
1430 - 0001	Individual	Roger	Webber		Yes	SP3	Not Stated	I understand that the Castle Point Plan 2026 - 2043 has been proposed and I have seen the publication, I have a lot of	Not Stated		The infrastructure on Canvey cannot cope with the of Gridlocked Roads every day. Sewerage, Drainage cannot cope now! Evacuation of people of people on the Island to safely. Is there a plan? Easier access for all the Emergency services at any time of day to get to where they are needed urgently. Road maintenance will increase. We do not have enough Doctors, Dentist now, most of the surgeries are full. Schools, pre-	Would it be possible for a meeting with a few Kings Park Village residents.					Concerned about highways impacts, infrastructure, drainage, emergency access. Concerned about the cost of the Plan.	Infrastructure: Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flooding: Flood risk covered in policies SD1-3 and the supporting Strategic Flood Risk Assessment (SFRA). Needs of emergency	N

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								concern and understanding. From what I have read, I am not sure why you need to supply a minimum number of homes of 3,143. The largest amount in Castle point. You have tried to say that the proposals will benefit of people who live on Canvey? 3.13 Castle Point is well connected within the wider Essex area and London by the strategic highway and railway network<. The A13, A127 and A130 within Castle			schools I find it strange that you have that produce a 219-page plan. I would like to know how much the plan costs and how many people were needed. I know you are very busy with what you do but what affect did this work< effect their work<. Did you need to employ Consultants. I get the feeling that you have made your mind up and you are wasting money which could have been use for more sensible projects. Who paid for all the plans? Please can you please reply. If I don't get a reply, it shows me that you're not bothered about the residents. There are so many issues, if I carried on, I also would have to too many issues, so I await to hear from you.						Wants a meeting arranged with a few Kings Park Village residents.	services considered in the supporting Infrastructure Delivery Plan (IDP). 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 The Plan went on consultatiin including public events attended by Council staff and planning officers, all residents were welcome to attend and discuss the Plan, or particular aspects of the Plan.	

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								Point link the Borough with opportunities in South Essex, Mid-Essex, and London. However, congestion on the strategic road network is significant at peak times, and there is a lack of resilience on these routes in the event of an incident I moved to Canvey in 2012 and worked in Basildon, by the time I retired, it had been getting worse, I was very pleased not to have to travel to Basildon and back each week. 8.1 Canvey Island is to the south of the											

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								Borough and is the largest town in Castle Point with around 40,000 residents. Surely before we can entertain the 3,143 homes, with appropriately 6,286 extra cars for the extra homes, we need to be sure that it is feasible to have so many vehicles added to what we have.											

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0343 - 0001	Agent	Ben	Weedall	Gladman Developments Ltd		Forword		3.1.1 The Duty to Cooperate requires engagement with prescribed bodies on relevant strategic and cross boundary matters. Paragraphs 24-27 of the NPPF sets out the requirements for Duty to Cooperate to ensure a positively prepared and justified strategy. The NPPF requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout								B	<u>Duty to Cooperate</u> Suggest that the Council has not complied with DtC through the preparation of Statement (s) of Common Ground (SoCG)	<u>Duty to Cooperate</u> Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								the process of Plan preparation n. As demonstrated through the outcome of the 2020 Sevenoaks District Council Local Plan examination and subsequent Judicial Review, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan. Similar issues were also identified in the preparation of Castle Point's new Local											

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								Plan(s) as identified above. 3.1.2 Local planning authorities are expected to cooperate through the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. Planning guidance sets out that local											

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								planning authorities should produce, maintain, and update one or more SoCG, throughout the plan making process. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been											

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								considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs. 3.1.3 There has been no evidence presented as part of this consultation which demonstrates how the Council have met the above duty to cooperate. Whilst the Housing Capacity Topic Paper notes that there have been discussions with neighbouring authorities this is as far as the evidence goes and it is not available											

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								for comment alongside this consultation. Without this evidence there is a real risk that the mistakes of the previous 2011-2031 Local Plan will be repeated which had to be withdrawn from examination due The Castle Point Plan 2026-2043 Regulation 19 Draft July - September 2025 8 to a failure to discharge the duty to cooperate. If this evidence is available, it should be presented alongside the submission											

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								n of this plan, if it is to progress that far.											
0343 - 0002	Agent	Ben	Weedall	Gladman Developments Ltd		Green Belt Assessment	No	3.3.1 An up-to-date assessment of the Green Belt has been undertaken to support preparation of the Plan. This Green Belt Assessment (GBA) concludes that 12 sub-areas are recommended for further consideration by the Council in the plan making process.	No							B	The Green Belt Assessment (GBA) concludes that 12 sub-areas are recommended for further consideration by the Council in the plan making process. It is not clear where this further consideration has taken place and this Land at Glebelands is one	Green Belt options were given specific consideration in the Green Belt Assessment evidence. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).	N

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								3.3.2 It is not clear where this further consideration has taken place and this must be appropriately evidenced. 3.3.3 Land at Glebelands is one site assessed by the GBA (GB4), it is found to have a moderate contribution to purpose a) and a weak contribution to purpose b). Gladman agree with this position. 3.3.4 The GBA goes on to identify 19 sub areas could be defined as grey belt due to the performan									site assessed by the GBA (GB4), it is found to have a moderate contribution to purpose a) and a weak contribution to purpose b). Gladman agree with this position. The GBA goes on to identify 19 sub areas could be defined as grey belt due to the performance against purposes a) and b). Purpose d is not assessed as there is no historic towns within the authority. Land off Glebelands is correctly		

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								ce against purposes a) and b). Purpose d is not assessed as there is no historic towns within the authority. 3.3.5 Land off Glebelands is correctly identified as ('potential') Grey Belt following consideration of purposes a) and b).									identified as ('potential') Grey Belt following consideration of purposes a) and b).		

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0343 - 0003	Agent	Ben	Weedall	Gladman Developments Ltd		SP3	No	Fundamentally, Castle Point Council Plan 2026 – 2043 Regulation 19 Draft July 2025 as proposed is unsound and should not proceed in its current form. The Plan does not plan for the Council's required housing need as calculated by the Standard Methodology and enshrined in national planning policy. The justification for not meeting this requirement is not satisfactory nor sufficiently evidenced by the Council. 1.1.6	No		With regards the Council's concern around the impacts of growth from Green Belt release on the highways and ability for sites to support sustainable infrastructure, the Council's housing topic paper identifies that those sites located away from town centres and transport corridor do not have ready access to services or public transport provision and do not contribute towards the critical mass to make shops and services more viable, and public transport and cycling measures viable and feasible. 3.4.15 It goes on to note that edge of town Green Belt sites have been promoted to the Council at circa 30-40 dwellings per hectare which is unlikely to sustain a bespoke services in the long term. However, the Transport Assessment Scoping document contradicts this statement noting that all of the Call for Site sites have the potential to be brought forward in a manner which would support active and sustainable transport measures and where the local impacts of associated transport demand could be accommodated and/or mitigated. In particular GB4 Land at Glebelands is noted to have access to bus routes 21 and 22, the nearest station is Benfleet, accessible by bus connection as well as having access to LCWIP corridors 1 and 1a and access to national highway junctions 8 and 14. This indicates that one the sites will be able to utilise the existing public transport and sustainable	It is clear from the discussion above that the Castle Point plan as currently presented is insufficient regarding housing delivery. The plan will only be making provision for approximately half of the standard methodology requirement and there is no evidence presented to demonstrate whilst the Council cannot deliver its full requirement and nor any agreed positions in terms of			Yes, Site Submission Profile for Land off Glebelands, Benfleet - Page 19 of PDF	B	The Plan does not plan for the Council's required housing need as calculated by the Standard Methodology and enshrined in national planning policy. Promotes land at Glebelands. Argues Green Belt boundaries should have been released and changed.	Housing need, including standard method, considered through the supporting evidence. Green Belt/Grey belt covered under policy GB2.	N

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								Gladman is promoting land in Benfleet through the emerging Castle Point Plan. This concerns land at Glebelands which is suitable for approximately 165 dwellings (the Site). The Site is available, suitable, and deliverable for housing as summarised in Section 5 of this representation. For the purposes of the Local Plan 2026 – 2043 this is an omission site despite the previous plan making history set			modes of travel in the area and through their patronage keep these services operating and secondly the individual schemes can address potential impacts on the highway network which may arise. This does not provide strong reasoning for the Council to not amend the Green Belt based on the capacity of the highways network. 3.4.17 Castle Point has a demonstrable unmet need for housing in light of the lack of a five-year housing land supply. Therefore development of Green Belt land that does not have any undue impacts on the wider countryside and Green Belt around and that the site should be considered for development, where it does not make a strong contribution to any one of purposes (a), (b), or (d) of the Green Belt purposes outlined in paragraph 143 of the NPPF. Subsequently this land in Castle Point is defined as Grey Belt if brought forward in a sustainable manner in accordance with national policy with reference to paragraphs 110 and 115 of the NPPF and also complies with the Golden Rules in accordance with Affordable Housing, Infrastructure and Green Spaces requirements as set out in national and local planning policy. The NPPF goes on at paragraph 116 to state that “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road	assistance from neighbouring authorities. 3.5.2 No significant amendments to the Green Belt boundaries are proposed despite assessment of the Green Belt boundaries finding 12 areas worthy of further consideration. 3.5.3 It is clear that this plan should not progress further as proposed the Council must first evidence should be presented of the joint working to date to								

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								out in Section 2 and the sites suitability for the reasons set out therein. 1.1.7 Amendments to Green Belt boundaries are necessary in order to deliver sustainable development in the Borough and land off Glebelands should be removed the Green Belt for the reasons set out in the Council's own evidence base supporting the Plan. 3.4.1 The plan seeks to provide for a minimum of 6,196 homes			network, following mitigation, would be severe, taking into account all reasonable future scenarios.” 3.4.19 It is clear from the Council’s own assessments that there would not be a severe impact upon the local highway network from identified growth options and there is no reason to prevent development on these grounds. 3.4.20 The above demonstrates that there are exceptional circumstances to support amendments to the Green Belt boundaries. The approach by the Council is fundamentally unsound and is not supported by its own evidence base. The Local Plan strategy should be revisited at and the Green Belt boundaries amended to support additional location that will increase the supply of both market and affordable homes or it can only be found unsound.	satisfy the requirements of the duty to cooperate, and sites should be identified after further consideration of the 12 areas identified by the Green Belt, this may be either option 2A or 2B from the SA of Policy SP3.							

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								over the plan period to 2034, at an average of 364 dwellings per annum. This falls significantly short of the current standard methodology target of 686 dwellings per annum. This policy is not sound, not positively prepared and inconsistent with national policy. 3.4.2 The national situation is set out concisely in a letter from Baroness Taylor, the Parliamentary Under Secretary of State at the Ministry of Housing, Communiti											

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								es and The Castle Point Plan 2026-2043 Regulation 19 Draft July - September 2025 10 Local Government to Cotswold District Council in August 20252, regarding the Council's "deep concerns" over revised housing targets for the district, which states: '...we are in the middle of one of the most acute housing crises in living memory. Home ownership is out of reach for too many, too few homes are											

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								built and even fewer are genuinely affordable. 3.4.3 The letter goes on to state: 'all areas of the country must play their part in building the homes we need. The Government expects local authorities to explore all options to deliver the homes their communities need: maximising brownfield land, working with neighbouring authorities, and, where necessary, reviewing Green Belt. Each authority is expected											

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								to assess and plan how to meet its local housing needs over the plan period.' 3.4.4 It is clear that Castle Point has also failed in such an approach and not playing its part in trying to deliver the homes the country and the local area needs. It is failing to deliver for its own residents and demonstrating effective work with its neighbours , to pursue the findings of this plans supporting Green Belt review and to deliver the housing											

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								needs of the Borough in accordance with national policy. 3.4.5 The steps needed to release and change Green Belt boundaries is set out within paragraph 145, 146 and 147 of the NPPF. NPPF paragraph 145 states that once established Green Belt boundaries should only be altered where exceptional circumstances are full evidenced and justified through the preparation or updating of plans.											

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								Paragraph 146 goes on to state that these exceptional circumstances can include, but are not limited to, an authority not being able to meet its identified needs for homes, commercial or other development through other means. If these exceptional circumstances exist, then authorities should review the Green Belt boundaries in order to meet the needs in full. Paragraph 147 of the NPPF sets out the criteria which authorities											

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								assess before concluding that exceptional circumstances exist to justify the change in Green Belt boundaries . This includes demonstrating that it has examined fully all other reasonable options for meeting its identified need for development. The first and second require the 2 Letter from MHCLG to Cotswold District Council (18th August 2025) 11 Council to demonstrate that the strategy makes as much use											

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								as possible of suitable brownfield sites and underutilised land. The Council's own consultation document makes clear that the strategy being put forward relies heavily on the use of brownfield land as it focuses development within the urban area. The third criteria, requires the strategy to have been informed by discussions with neighbouring authorities about the accommodation of growth through a statement											

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								of common ground. As identified earlier within these representations there has been no evidence provided that there have been meaningful discussions with neighbouring authorities and there is no statement of common ground provided. Whilst there is no objection to deliver housing on brownfield sites, the NPPF does not support a brownfield first policy and sites other than brownfield are required in order to deliver the											

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								Borough's housing needs as identified by the Council's own assessments (in that it is only seeking to deliver around half of the Standard Method's requirements). 3.4.8 It is clear therefore that exceptional circumstances exist, and the Green Belt boundaries should be amended to ensure that the full housing requirement is met. 3.4.9 There is one more step which needs to be taken when assessing whether Green Belt											

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								boundaries should be altered. Paragraph 146 adds the caveat that if a Green Belt review demonstrates that changes would fundamentally undermine the purposes (taken together) of the remaining Green Belt this may also justify a reduction in meeting the housing needs in full. 3.4.10 Despite this evidence of overwhelming housing need and lack of impacts upon the strategic function of the Green											

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								Belt, the Council has elected not to alter the Green Belt boundaries . 3.4.11 Castle Point should meet it's housing target as calculated by the Standard Method as required national policy. Therefore sustainable Green Belt release will be required to meet the housing requirement where this Green Belt does not prevent urban sprawl, prevent neighbouring towns from merging and preserve the setting											

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								and special character of historic towns. As previously identified in the preceding section, the Council's own Green Belt assessment has assessed parcels of Green Belt capable of release without undermining the remaining Green Belt and its strategic functions. 3.4.12 The justification given by the Council in the supporting text to SP3 is identified that achieving the total housing target "would significantl											

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								y and irreversibly destroy large tracks of Green Belt, including land which strongly contributes to the Green Belt purposes, and undermine the approach to protected and enhancing the natural environment.” It goes on to note that “transport modelling has shown that the road network in Castle Point, operates at capacity already, and the impacts of growth would be severe. It has also been demonstrated that there are											

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								sustainable accessibility and accessibility issues with sites within the Green Belt that would act to worsen this situation without being able to provide the levels of mitigation necessary to reduce impacts on the strategic road network". This is supported by the Housing Capacity Topic Paper which identifies other footnote 7 constraints , biodiversity designations under the NERC Act, flood risk, open											

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								space deficit and heritage considerations.											
0343 - 0004	Agent	Ben	Weedall	Gladman Developments Ltd		Hou2	Yes	Gladman note that all proposals for new residential development resulting in 10 or more net additional homes (or 0.5 hectares or more) exceptiona	Yes							B	Support approach to Affordable Housing	Noted	N

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								lly permitted on grey belt land or otherwise within the extent of the Green Belt will provide 50% affordable housing, of which 50% will be for social rent, and 50% will be for affordable home ownership. This approach is supported in order to demonstrate that development can be brought forward that complies with the Golden Rules in accordance with Affordable Housing ensuring that the development is sustainable and is in											

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								accordance with national policy with reference to paragraphs 110 and 115 of the NPPF.											
0343 - 0005	Agent	Ben	Weedall	Gladman Developments Ltd		Hou3	Yes	Gladman agree that a range of house types are required to meet local requirements and to ensure mixed and balanced communities and note that house type requirements are informed by the Local Housing Needs Assessment (LHNA). As stated in the policy's reasoned justification that the housing mix should also reflect the local context of the site, as	Yes							B	Support for Policy Hou3. Gladman agree that a range of house types are required to meet local requirements and to ensure mixed and balanced communities and note that house type requirements are informed by the Local Housing Needs Assessment (LHNA). Note reasoned justification caveats.	Noted	N

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								it is recognised that it will not be possible to secure a full mix of house sizes and types on all sites and that consideration will be made on an individual site basis.											
0343 - 0006	Agent	Ben	Weedall	Gladman Developments Ltd		D2	No	Gladman support the Council's proposed approach to seeking higher density in areas in appropriate locations. It is important to optimise density, whilst having regard to local character and appearances, provide communal and public amenity multi-	No							B	Support the Council's proposed approach to seeking higher density in areas in appropriate locations. But do not support the Council's approach or consideration of 'premium sustainability'. Clearly there are locations where higher density is	Noted	N

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								functional spaces, enhance permeability and improve access to services in the local area by well connected active and sustainable modes and to be of exemplary design, contributing to the evolution of local character. Gladman however do not support the Council's approach or consideration of 'premium sustainability'. Clearly there are locations where higher density is appropriate but such a definition of 'premium									appropriate but such a definition of 'premium sustainability' is not supported or set in national policy.		

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								sustainability' is not supported or set in national policy. The Council should revisit this definition accordingly.											
0343 - 0007	Agent	Ben	Weedall	Gladman Developments Ltd		GB1	Not Stated	In conjunction with the commentary on Policy SP3 – Meeting Development Needs outlined above, Gladman note that Council position that: Development of Grey Belt land is permissible where development would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the								B	The policy should be amended to reflect national policy and support grey belt development.	Noted Green Belt/Grey belt covered under policy GB2. Development decisions will be informed by consideration of the NPPF in its entirety. The Council has undertaken a Green Belt Review in accordance with the requirements of the Government's 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	N

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								area of the plan, where there is a need for the development proposed, where the site is sustainably located with good access to services and transport choices, and where high levels of affordable housing, infrastructure and open space provision are secured. 4.1.7 The supporting text considers grey belt land and notes that "Development of Grey Belt land is permissible where development would not										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. Where our	

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								fundamentally undermine the purposes (taken together of the remaining Green Belt across the area of the plan, where there is a need for the development proposed, where the site is sustainability located with good access to services and transport choices, and where high levels of affordable housing, infrastructure and open space provision are secured". This consideration is not reflected within the										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. 2018 Green Belt Assessments still form part of the evidence and considered wider areas.	

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								policy itself which does not mention grey belt within it – the policy should be amended to reflect national policy and support grey belt development. 4.1.0 As detailed in the policy, we also note that certain exceptions exist which regard development in the Green Belt to not be inappropriate and that development should not approved unless very special circumstances exist, where potential harm to the Green Belt by											

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								reason of the inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. As discussed, Castle Point Borough Council previously proposed to allocate Green Belt Land for residential development. Evidence submitted to justify this approach was supported by the Council and the plan underwent examination between May and June 2021 with the examining Inspector providing											

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								their report on the plan in March 2022 finding the plan sound.											
0343 - 0008	Agent	Ben	Weedall	Gladman Developments Ltd		GB2	Not Stated	In conjunction with the commentary on Policy SP3 – Meeting Development Needs outlined above, Gladman note that Council position that: Development of Grey Belt land is permissible where development would not fundamentally undermine the purposes (taken together) of the remaining Green Belt								B	Policy SP3 - further comments on 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	N

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								across the area of the plan, where there is a need for the development proposed, where the site is sustainably located with good access to services and transport choices, and where high levels of affordable housing, infrastructure and open space provision are secured. 4.1.7 The supporting text considers grey belt land and notes that “Development of Grey Belt land is permissible where development would										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. 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	

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								not fundamentally undermine the purposes (taken together of the remaining Green Belt across the area of the plan, where there is a need for the development proposed, where the site is sustainability located with good access to services and transport choices, and where high levels of affordable housing, infrastructure and open space provision are secured". This consideration is not reflected										above. 2018 Green Belt Assessments still form part of the evidence and considered wider areas.	

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								within the policy itself which does not mention grey belt within it – the policy should be amended to reflect national policy and support grey belt development. 4.1.0 As detailed in the policy, we also note that certain exceptions exist which regard development in the Green Belt to not be inappropriate and that development should not approved unless very special circumstances exist, where potential harm to the Green											

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								Belt by reason of the inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. As discussed, Castle Point Borough Council previously proposed to allocate Green Belt Land for residential development. Evidence submitted to justify this approach was supported by the Council and the plan underwent examination between May and June 2021 with the examining Inspector											

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								providing their report on the plan in March 2022 finding the plan sound.											
0343 - 0009	Agent	Ben	Weedall	Gladman Developments Ltd		ENV3	Not Stated	This policy will require all major development to achieve minimum biodiversity net gain of 20%. Gladman do not consider it sound for a higher requirement to be placed over and above the national policy requirement of 10%. 4.1.2 In considering the soundness of this policy it is necessary to consider paragraph	No		Gladman does not consider that the evidence used to justify this approach is sufficiently robust and as such 10% should be the requirement.					B	Comment on BNG and evidence for 20%.	As set out in paragraph 18.29 'The Environment Act 2021 introduced Biodiversity Net Gain. This mandates that most developments should deliver at least 10% biodiversity net gain, using a specific metric developed by the Government. Local areas can set a higher requirement through their plans where it can be demonstrated it would be deliverable. Viability testing has indicated it is possible to secure 20% biodiversity net gain on greenfield sites,	N

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								74-006-20240214 of PPG which states that: "... plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for developme										and this requirement has been set for those sites to improve local contribution to the local Nature Recovery network identified through the Local Nature Recovery Strategy for Essex.'	

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								nt. Consideration will also need to be given to how the policy will be implemented”											
0343 - 0010	Agent	Ben	Weedall	Gladman Developments Ltd		SD4	Not Stated	This policy requires all new development to be fossil fuel free and demonstrate net zero operation carbon onsite, by achieving an energy use standard of 35kwh/m2 /year for all new dwellings. These new dwellings are also identified as having a space heating demand of less than 15 kwh/mw/year. Gladman agree that there is a need to	No	Not Stated						B	Policy SD4 Gladman do not consider that the Council’s policy is necessary as there is already a national approach set out in Building Regulations and in the form of the Future Homes Standard and may also be covered through the National Development Management policies which are being drawn up. By	As set out in reasoned justification paragraphs to Policy SD4, this has been informed by work at County level.	N

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								reduce carbon emissions in both the construction and use of residential development. However, Gladman do not consider that the Council's policy is necessary as there is already a national approach set out in Building Regulations and in the form of the Future Homes Standard and may also be covered through the National Development Management policies which are being drawn up. By utilising a national rather than local									utilising a national rather than local approach ensure uniformity across the whole country rather than a variety of different approaches which differ between local authority areas.		

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								approach ensure uniformity across the whole country rather than a variety of different approaches which differ between local authority areas.											
0343 - 0011	Agent	Ben	Weedall	Gladman Developments Ltd		SD5	Not Stated	This policy requires proposals for large scale new-build developments, for residential schemes this is minimum of 100 dwellings, to submit a Whole Life-Cycle Carbon Assessment that demonstrates development meets the identified targets. As with the above policy this is a matter	Not Stated							B	Policy SD5 As with policy SD4 this is a matter which best addressed at the national, rather than local level, to ensure that high standards are met across the entire country and avoid any confusion and repetition between local and national policies.	As set out in reasoned justification paragraphs to Policy SD5, this has been informed by work at County level.	N

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								which best addressed at the national, rather than local level, to ensure that high standards are met across the entire country and avoid any confusion and repetition between local and national policies.											
0343 - 0012	Agent	Ben	Weedall	Gladman Developments Ltd		SD9		The policy requires all new residential development to achieve a water efficiency standard of 90 litres per person per day. New development should incorporate rainwater harvesting and grey water technologies for non-potable water uses								B	Policy SD9 Object to lower water efficiency standards. State that the The water standard is best calculated at a national level in accordance with building regulations,	Noted. Policy SD9 supported by evidence, noting that Essex is a water stressed area.	N

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								on site. Finally, new development should demonstrate that adequate foul water treatment and drainage already exist or can be provided in time to serve the development. 4.1.7 The requirement for 90 litres per person is not in line with national policy which requires residential development to achieve 110 l/p/d, additionally this requirement is for water stressed areas. The water standard is best											

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								calculated at a national level in accordance with building regulations , currently the future water standards are being considered which will phase the introduction of consistent standards across the country. 4.1.8 With regards to foul water, it is not the responsibility of the housebuilder to ensure that the water company can service a development by providing connections. Water companies have a legal responsibility to											

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								ensure that the requirements of the development plan system can be met by virtue of the Water Industry Act 1991. 4.1.9 The Water Companies are required by law to publish a Water Resource Management Plan every five years which is approved by the Environment Agency and Defra, as part of this the water company will need to account for future development requirements of the local authority. Therefore this policy should be											

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								removed from the plan as it is dealt with by other provisions under other legislation as above.											
0343 - 0013	Agent	Ben	Weedall	Gladman Developments Ltd		Whole Plan	No	Gladman welcome the opportunity to comment on the Castle Point Council Plan 2026 – 2043 Regulation 19 Draft July 2025 consultation. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2024) and the associated updates	No		6.1.4 As discussed, principally, the Council is not planning for their housing target as calculated using the Standard Methodology as required by national planning policy. Justification for this reduced requirement provided by the Council that the authority cannot deliver their required housing target without Green Belt release is not satisfactory evidence to support this reduction in housing requirement in line with national planning policy. 6.1.5 The Council's approach should be reconsidered in order to deliver Castle Point's housing requirement, with the Council at the very least moving forward with Option 2a as identified in the Sustainability appraisal. 6.1.6 In its current form, the Plan will be found unsound and progressing the Local Plan to examination stage would not be an appropriate use of both public resources and expenditure. Local authorities should not be allowed to a submit plan that they consider					B	Not meeting national housing figure. Should proceed with Option 2a as identified in the Sustainability appraisal.	Noted	N

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								that were made to Planning Practice Guidance. 6.1.2 Gladman have provided comments on a number of the issues that have been identified in the Council’s consultation material and recommended that the matters raised are carefully explored during the process of undertaking the new Local Plan. 6.1.3 The Castle Point Council Plan 2026 – 2043 Regulation 19 Draft July 2025 document as proposed is unsound.			unsound, with Castle Point Borough Council recognising themselves that there is a considerable risk of the plan being found unsound when considered against NPPF 2024. 6.1.7 Submission of the Plan will be contrary to paragraph 20 of the Planning and Compulsory Purchase act (PCPA) 2004 which confirms that an authority must not submit a plan unless think it is ready for independent examination. The Council would therefore be open to legal challenge if it submits a plan for examination that itself considers is at significant risk of being found unsound. 6.1.8 The Council must revisit its strategy in its Local Plan and allocate sites appropriately or set policies in order to meet its objectives and requirement in delivering housing as required by national policy.								

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0044 - 0001	Individual	Sandra	Weigh t		Not Stated	SP3	Not Stated	I found your website on the Castle Point pre submission local plan completely unnavigable. I sincerely hope that this isn't to deter people, like myself, from objecting to our local green environment and communities being destroyed by housing and the infrastructure needed to support such a project. I object most strongly to the fact that these proposed homes will not even go to local people! The chaos that such a project would	Not Stated	Not Stated			Not Stated		No		Object to new homes not going to local people. Concerned about impacts upon highways congestion, infrastructure, heritage (Hadleigh Castle) and foreshore	Noted. Housing needs informed by the Housing Needs Assessment, which includes an assessment of local 'concealed' families and suppressed household formation, as well as migration trends. The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). The Council published a Hadleigh Farm estate Heritage Impact assessment in June 2025. Much of the District's foreshore areas are protected either as international sites or as SSSI. Impacts of development are considered in the Habitat Regulations Process (HRA).	N

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								cause to one of the two main arteries to and from our coast would be catastrophic for Southend, Leigh, Hadleigh, Canvey and Rayleigh. The amount of traffic the extra houses and people generate would devastate our crumbling roads and walkways. Our overcrowded, hospitals, doctors and schools would be a nightmare for all who live here. Our wonderful heritage site, Hadleigh Castle, and our foreshore											

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								would be under severe threat. As a local resident I urge you not to go forward with this awful plan. People do not want it! Our area is so much more than a government target. I trust that you will consider my comments as I believe they are shared with most of us who live here.											
0274 - 0001	Organisation	Kit	Welch	Chelmsford City Council	Not Stated	Forword	Yes	It is noted by Chelmsford City Council that CPBC has engaged with neighbouring authorities under the Duty to Cooperate to seek assistance	Yes				Not Stated		No	A	It is noted by Chelmsford City Council that CPBC has engaged with neighbouring authorities under the Duty to Cooperate to seek	Points noted.	N

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								meeting their housing need and were unable to do so. This includes approaching CCC in 2022 in CPBC's response to the Chelmsford Local Plan Issues and Options Consultation Document. CCC recognises there may be some challenges and constraints on developable land in CPBC's administrative area, however CCC reiterate that they are unable to help meet any of CPBC's unmet housing need. CCC									assistance meeting their housing need and were unable to do so. This includes approaching CCC in 2022 in CPBC's response to the Chelmsford Local Plan Issues and Options Consultation Document. CCC recognises there may be some challenges and constraints on developable land in CPBC's administrative area, however CCC reiterate that they are unable to help meet		

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								confirms that it wishes to continue to actively engage with CPBC on each other's respective Local Plans and relevant strategic cross-boundary matters including housing, employment, transport infrastructure, education, Gypsy, and Travelling provision, and Essex Coast RAMS.									any of CPBC's unmet housing need. CCC commends the Plan's place-led approach and its clear commitment to environmental stewardship, climate resilience, and nature recovery.		
0274 - 0002	Organisation	Kit	Welch	Chelmsford City Council	Not Stated	Hou6	Yes	CCC welcomes the full provision of the required Gypsy and Traveller Sites within the administrative boundary of CPBC.	Yes				Not Stated		No	A	CCC welcomes the full provision of the required Gypsy and Traveller Sites within the administrative boundary of CPBC.	Noted	N

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0274 - 0003	Organisation	Kit	Welch	Chelmsford City Council	Not Stated	Sustainable Development	Yes	CCC commends the Plan's place-led approach and its clear commitment to environmental stewardship, climate resilience, and nature recovery. We welcome the inclusion of Policies SD4 and SD5, which address both operational and embodied carbon, aligning with national net-zero ambitions. CCC also suggests strengthening delivery mechanisms for retrofit and energy efficiency in existing housing stock.	Yes				Not Stated		No	A	We welcome the inclusion of Policies SD4 and SD5, which address both operational and embodied carbon, aligning with national net-zero ambitions. CCC also suggests strengthening delivery mechanisms for retrofit and energy efficiency in existing housing stock. CCC suggests exploring cross-boundary opportunities for climate adaptation infrastructure, especially	Support for policies SD4 and SD5 noted and suggestion for exploring cross-boundary opportunities for climate adaptation infrastructure	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
								CCC suggests exploring cross-boundary opportunities for climate adaptation infrastructure, especially in relation to water management and heat resilience.									in relation to water management and heat resilience. CCC confirms that it wishes to continue to actively engage with CPBC on each other's respective Local Plans and relevant strategic cross-boundary matters including housing, employment, transport infrastructure, education, Gypsy, and Travelling provision, and Essex Coast RAMS.		
0119 - 0001	Individual	Carol	Welfare		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan	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	PROPOSED MODIFICATION: Add North West	Not Stated		No		Housing target for Castle Point not met. The site selection	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

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
								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.			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.	Thundersley site.					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	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 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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																	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.		
0119 - 0002	Individual	Carol	Welfare		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

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
0320 - 0001	Individual	John	Wellmen			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.					Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. 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	Grey belt covered under policy GB2. SLAA and Sa considered all reasonable site options. North-West Thundersley: 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. Flooding and infrastructure 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. Needs of emergency services considered	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).

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
																	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. development should be directed away from areas at highest	in the supporting Infrastructure Delivery Plan (IDP).	

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																	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.		
0320 - 0002	Individual	John	Wellmen			C4	No	Canvey West homes	No	Not stated							The number of Canvey	Needs of emergency services considered in the supporting	N

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								puts residents in the East at risk with emergency evacuation procedures.									West homes puts residents in the East at risk with emergency evacuation procedures	Infrastructure Delivery Plan (IDP).	
0630 - 0001	Individual	Marion	Wells		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant ,	Support noted.	N
0707 - 0001	Individual	linda	wells		Yes	SP3	Yes		No	Positively prepared, Effective, Justified	Sandy Bay is increasing by 300 dwellings over the next 2 years this is not in any plan or accounted for. The infrastructure is already stretched, schools, doctors etc. I find it difficult to move round the island as it is so with extra housing this is going to be mere impossible regardless of any additional exit roads added. I feel the utilisation of North West Hadleigh would be a better option for the 3000 homes and would allow Charfleets to remain without having to be relocated. There is no justification for the density levels to be increased just on Canvey Island without due consideration to other Brownfield sites within Castle Point.		No	Not Answered	Not Answered	A	Existing Commitments North West Thundersley Infrastructure	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). However, it is agreed that the plan could have been clearer on this point and a modification is proposed to signpost this reference in the supporting text. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic	N

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																		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. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
1306 - 0001	Individual	Anne	Wells		Yes	Whole Plan	Yes	I support the Castle Point Plan Draft I consider the 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
0197 - 0001	Individual	Caroline	West		Yes	SP3	No	Dear Sir/Madam , I DO NOT support the Castle Point Plan Regulation	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	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS

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								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.			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.						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	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.	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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																	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.		
0197 - 0002	Individual	Caroline	West		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	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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																	procedures		
0287 - 0001	Individual	Gary	West		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 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, should they be forced to move to	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	No		No	A	Fails to consider strategic alternatives like North West Thundersley. No credible 5 year housing land supply. The site selection ignores green belt / grey belt against new NPPF guidelines . Not all sites have been considered. No green Belt/Grey Belt sites added, specifically with the exclusion on North West Thundersley. NPPF guidelines state that developm	<u>North-West Thundersley</u> 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. <u>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Green Belt</u> Green Belt/Grey belt covered under policy GB2. <u>Reasonable Options</u> All reasonable option sites considered in SLAA and SA. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure	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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											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.	target of 11,000.					ent should be directed away from areas at highest risk of flooding. Sustainable drainage measures are not appropriate for Canvey Islands unique geography and drainage 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. Canvey SuDS options have been considered through the SFRA.	
0287 - 0002	Individual	Gary	West		Yes	C4	No	, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	No	Not Stated			No		No	A	The 3316+ urban homes for Canvey is not resident led. Canvey west homes puts residents in the east at risk with emergency evacuation procedures. Objects to allowing mixed use	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP). 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	N

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																	on Charfleet s.	used for these purposes'	
1310 - 0001	Individual	L	West			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
1310 - 0002	Individual	L	West			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	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	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	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

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												housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					are not appropriate for Canvey Island's unique geography and drainage infrastructure.	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 point onwards. For further information please see housing topic paper.	Point Strategic Flood Risk Assessment (SFRA).

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																		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. 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	

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																		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. 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. Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA), including in relation to Canvey. SUDs	

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																		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.	
1310 - 0003	Individual	L	West			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
1313 - 0001	Individual	Alan	West			Hou5					The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All our homes are		No				Policy HOU5 should make	Comments noted. Policy HOU5 does not restrict	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
											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.						provision for improved site environment for the local residents	improvement to the sites environment	
1313 - 0002	Individual	Alan	West			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	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	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 common for stepped increases in housing delivery to be set out and agreed in plans,	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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												target of 11,000.					infrastructure.	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 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	

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
																		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. 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 capacity of the highway network in and around Castle	

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																		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. 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 design Guide for Essex.	

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																		Canvey SuDS options have been considered through the SFRA.	
1313 - 0003	Individual	Alan	West			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
0428 - 0001	Individual	Doreen	Weston		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and	Support noted.	N

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																	legally compliant ,		
0183 - 0001	Individual	Dawn	Wheeler-Boreham		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	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).

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																	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.		
0183 - 0002	Individual	Dawn	Wheeler-		Yes	C4	No	Canvey West homes	No	Not Stated			Not Stated		No		The number of Canvey	Needs of emergency services considered in the supporting	N

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			Boreham					puts residents in the East at risk with emergency evacuation procedures.									West homes puts residents in the East at risk with emergency evacuation procedures	Infrastructure Delivery Plan (IDP).	
0819 - 0001	Individual	Samantha	Whelan	GB Vehicles	Yes	SP3	No	Are there not other areas? Lowering jobs and increasing traffic	No	Justified	The local plan is not justified with the national policy. Doesn't meet the housing target for CPBC. Site selections ignore greenbelt/greybelt against new NPPF guidelines. Site selection strategy is biased and predetermined towards a "no greenbelt built policy". This is based on over development of Brownfields sites. Not all sites considered. No greenbelt/greybelt sites added and with the exclusion of NW Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey's unique geography and drainage infrastructure. The proposed homes for Canvey is not resident led and this development would put residents in the East of Canvey at risk with emergency evacuation.	Add NW Thundersley site. 187HA A greenbelt/greybelt Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200 with Canvey at 1050.	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 of growth in Castle Point.	N

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																		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 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	

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																		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 position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. Green/Grey Belt The Council has undertaken a Green Belt Review in	

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																		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 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	

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																		policy GB2. 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. 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	

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																		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 are here www.castlepoint.gov.uk/emergencyplanning/	

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1183 - 0001	Individual	Victor	Whelan			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1183 - 0002	Individual	Victor	Whelan			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1183 - 0003	Individual	Victor	Whelan			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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0375 - 0001	Individual	Linda	White		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 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 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	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.							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 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	

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																		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 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	

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																		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. 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 capacity of the highway network in and around Castle	

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																		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. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	
0442 - 0001	Individual	Patria	White		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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0491 - 0001	Individual	John	White		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No		All		Castle Point Plan is sound and legally compliant ,	Support noted.	N
0757 - 0001	Individual	Alan	White		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant ,	Support noted.	N
0758 - 0001	Individual	Julia	White		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant ,	Support noted.	N
0785 - 0001	Individual	Karen	White		Yes	SP3	Yes		No	Effective	The amount of homes planned for Canvey Island will not be effective as simply no infrastructure to cope with that increase of population to the island.	Modifications necessary are a complete change of highways giving a direct route to A13/A130 . Maybe a flyover to A130. This will help the population already living here.	No	Not Answered	Not Answered	A	Third Road onto Canvey Infrastructure	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,	N

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

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1205 - 0001	Individual	David	White			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1205 - 0002	Individual	David	White			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1205 - 0003	Individual	David	White			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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1214 - 0001	Individual	Margaret	White			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1214 - 0002	Individual	Margaret	White			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1214 - 0003	Individual	Margaret	White			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
1394 - 0001	Individual	Joyce	White		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
0156 - 0001	Individual	Ian	Whitlock		Yes	SP3	No	Dear Sir/Madam , I DO NOT support	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	PROPOSED MODIFICATION:	Not Stated		No	A	Housing target for Castle Point not met.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both	Y - Policy SD3(3) 3. Proposals must

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								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.			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. Ultimately, if housing is required on Canvey Island, increased infrastructure needs to be first, and not after the new housing.	Add North West Thundersley site. There has been no new road off Canvey Island since the 1970s, the population has tripled and the per person number of cars has increased. Also consider the option of a train station on Canvey Island.... does that sound difficult? Well so does living without adequate links and increased population and a flooding safety hazard. The housing quota					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	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.	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 also at least be equally divided among the district, with Daws Heath also being considered (although I do assume that councillors live there so don't want to devalue their own area?). Daws Heath has great access to the A127 so could increase the use of St Michael's Road. Any housing planned should be in the character of the area. E.g. bungalows and houses. Not					te 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.		

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												blocks of flats that would alter the character of the area to something of a London suburb.							
0156 - 0002	Individual	Ian	Whitlock		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
0914 - 0001	Individual	Lauren	Whitlock		Yes	SP3	No	I believe other areas of Castle Point (excluding Canvey Island) Has more scope. But until infrastructure has improved for all of Castle Point, no more houses.	No	Effective, Justified			No	Not Answered	Not Answered		Infrastructure	Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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0501 - 0001	Individual	George	Whittons		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 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 procedure s	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 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	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.						Need for a third road to be included in the plan.	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 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.	

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																		Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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 capacity of the highway network in	

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																		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. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey,	

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																		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 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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0501 - 0002	Individual	George	Whittons		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 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 has been identified through the Open	N

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																		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.	
0501 - 0003	Individual	George	Whittons		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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0865 - 0001	Individual	Harry	Wigley		Yes	HAD2	Yes		No	Effective, Justified	I am writing to object to the proposed allocation of the HAD2 site (Hadleigh Salvation Army Land) for housing development in the Castle Point Local Plan (Regulation 19 Draft, July 2025). My objection is based on the following grounds, with references to the relevant sections of the Plan: 1. Inappropriate Development in the Green Belt The Plan's own Green Belt policy (Section 17, pp. 126–130, Policy GB1, paragraphs 17.1–17.12) makes it clear that development in the Green Belt is inappropriate unless “very special circumstances” exist. No such circumstances have been demonstrated for HAD2. Allocating this site would undermine the fundamental purpose of the Green Belt, which is to prevent urban sprawl and protect the openness of the landscape. 2. Harm to Openness, Landscape, and Heritage HAD2 sits adjacent to Hadleigh Castle and Hadleigh Country Park—both of which are highly valued for their landscape, biodiversity, and heritage. Section 10 (Hadleigh, pp. 66–73, especially paragraphs 10.12–10.19) and Section 18 (Protecting our Biodiversity and Landscape, pp. 131–141, Policy BL1) of the Plan highlight the importance of these assets. Development here would cause irreversible harm to the openness of the Green Belt and the setting of these historic and	For these reasons, and with reference to the above sections and policies of the Castle Point Local Plan Regulation 19 Draft (July 2025), I respectfully request that the allocation of HAD2 be removed from the Plan. The Council should instead focus on delivering new homes through urban and brownfield regeneration, in line with its own stated strategy and the wishes of the local community.	No	Not Answered	Not Answered		Objecting to built development on site HAD2	Policy HAD2 does not propose housing to be built on this site.	N

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											natural features. 3. Infrastructure and Congestion Section 19 (Providing the Infrastructure Required to Support Growth, pp. 142–155, Policy INF1, paragraphs 19.1–19.14) acknowledges that Hadleigh already suffers from congestion and infrastructure constraints. Adding a large housing development at HAD2 would only make these problems worse, putting further strain on local roads, schools, and health services. 4. Failure to Prioritise Brownfield and Urban Sites The Plan’s spatial strategy (Section 6, pp. 19–30, Policy SP2, paragraphs 6.10–6.18) and housing policies (Section 13, pp. 85–93, paragraphs 13.1–13.8) both commit to an “urban-first, brownfield-led” approach. Allocating HAD2 directly contradicts this strategy, as there are still brownfield and urban sites available that would cause less harm and better align with the Plan’s objectives. 5. Community Opposition and Policy Conflict Section 5 (Vision & Objectives, pp. 17–18) and the Plan’s consultation summary reflect overwhelming community opposition to the loss of Green Belt land at HAD2. Proceeding with this allocation would undermine public trust and conflict with both local and national policy priorities.	Once all localised developed areas are exhausted, The Blinking Owl Site formerly known as GB8 is the only viable option. Whilst it serves as nature land, it is not impacting to any landscapes, heritage and can act as a mini-town with its own traffic routing. One large note to consider is that all other councils are needing to go through the same process. Hadleigh has only							

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												ONE road in and out that will need on the traffic of Southend Council's plans, unless you are willing to put childrens lives at risk by turning already over-used rat run roads that go past 2 primary schools (Church Road) into main roads.							

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0866 - 0001	Individual	Margaret	Wigley		Yes	SP3	Yes		No	Justified, Consistent with national policy	It doesn't meet the policy required target and has not included any green or grey belt. It is biased towards an anti-build on the green belt agenda which has considered alternative sites with overdevelopment on brownfield sites especially on canvey	Consider the GB16 site as it could sustain a new village. It will help traffic and utilities already maxxed out in built up areas.	No	Not Answered	Not Answered		Not meeting housing targets Havent considered Green/Grey Belt North West Thundersley	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 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	N

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																		but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. 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 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	

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																		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. 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.	
1433 - 0001	Individual	Margaret	Wigley		Yes	Whole Plan	Yes		No	Consistent with National Policy	It is great that the people have been listened to and the green belt is being preserved. However the government may very well insist that more greenbelt must be used	Think that the Thundersley area that could house a	No				It is great that the people have been listened to and the	North West Thundersley was considered but not preferred. The SOCG between CP and ECC set out the	N

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												whole village with its own amenities may satisfy the government that enough housing options have been included					green belt is being preserved . Think that the Thundersley area that could house a whole village with its own amenities may satisfy the government that enough housing options have been included	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.	
1329 - 0001	Individual	Terry	Wildman			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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1329 - 0002	Individual	Terry	Wildman			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 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	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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																		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 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	

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																		why North West Thundersley was not preferred. 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 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	

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																		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. 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 design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1329 - 0003	Individual	Terry	Wildman			C4					The number of Canvey West homes puts residents in the East		No				Development at West	The safety of all Castle Point residents is a priority	N

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											at risk with emergency evacuation procedures						Canvey will impact emergency evacuation procedures for those residents living at East Canvey	and has been considered within the Castle Point Plan	
0461 - 0001	Individual	Tegan	Wilkinson		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant ,	Support noted.	N
0229 - 0001	Individual	Jennifer	Williams		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		I consider the draft plan to be sound		Not Stated		No	A	Castle Point Plan is sound and legally compliant ,	Support Noted	N

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0332 - 0001	Agent	Corin	Williams	Iceni OBO The Inner London Group		SP3	No	Draft Policy SP3 sets out the overall levels of growth being planned for in the new Local Plan. It identifies a requirement to deliver a minimum of 6,196 net additional dwellings and 0 ha of employment land over the Plan period to 2043. The Spatial Strategy seeks to deliver the majority of homes in the later part of the plan period, aiming to bring forward a brownfield register for sites, development masterplans for town								B	Promoting Site GB3 <u>Policy SP3</u> The objectively assessed housing and employment need targets are far below what is required and expected by national policy. Considers that the most effective way to retain jobs in the borough is to create more opportunities for employment growth and as such consider that Policy SP3 should be amended to clearly identify what the employm	<u>Policy SP3</u> Employment land requirements are stated in paragraph 6.36 ' <i>In terms of employment need, data on employment growth indicates that there will be a small surplus of employment land arising over the Plan period of circa 2ha. This is additional to 7.5ha of land that has extant planning consent for employment uses at West Canvey. This means there is a potential surplus of 9.5ha of employment land over the Plan period.</i> ' So it is not necessary to identify targets by employment use in the policy. <u>SA</u> Grey Belt is implicitly recognised in option 2a in it's title 'Release a limited number of approximately 5 Green/Grey Belt sites'. The explicit reference to grey belt distinguishes it from options 1, 3 and 4. The respondents' preference for option 2a is noted.	N

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								centre sites and renew designated employment sites with a mix of uses comprising housing, industrial and commercial uses in accordance with relevant policies. 2.3 Whilst Inner London support the intentions of Policy SP3 to “support development needs” across the plan period, the objectively assessed housing and employment need targets are far below what is required and expected by national policy. As it stands,									ent land target is for different types of employment use (e.g. office use, general industrial use, storage and distribution use). Inner London also object to the assertion in the supporting text that there will be a surplus of employment land, particularly industrial land over the plan period. SA Suggest there are significant inaccuracies and shortcomings in the evidence base used by the		

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								the draft plan only seeks to address 52% of the housing need calculated for the borough by the new Standard Method, with the supporting evidence providing insufficient reasons as to why a population of nearly 90,000 people will generate a 0ha employment need over the next 20 years. 2.4 Paragraph 3.9 of the draft plan states that the current value of the local economy is around £1.1bn. This equates to a GVA of around £20,500									Council to inform the Local Plan development targets. As a result, the Sustainability Appraisal and its judgements on the relative merits of different development options are based on flawed and outdated data. This undermines the credibility of the Appraisal's conclusions and means the Local Plan cannot be considered justified or supported by a robust evidence base, as required by the		

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								per working age person which the plan highlights is “significantly below the Essex and national averages”. Paragraph 3.11 also states that despite the high work participation percentage of 87.9%, the commuter ratio stands at 54% meaning that most people need to commute outside the borough to secure higher wages which can be obtained elsewhere within the Southend and Brentwood Travel-to-Work Area.									NPPF. It is considered that in assessing Option 2a, the SA has given insufficient weight to the benefits of and the need to deliver new housing and employment growth. The SA also fails to appreciate that Grey Belt sites are, by definition, of a lower environmental / ecological quality than Green Belt sites by virtue of Footnote 7 of the NPPF which does not allow parcels to		

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								2.5 Inner London consider that the most effective way to retain jobs in the borough is to create more opportunities for employment growth and as such consider that Policy SP3 should be amended to clearly identify what the employment land target is for different types of employment use (e.g. office use, general industrial use, storage and distribution use). Greater clarity is also required on how the council									be classified as Grey Belt if its constraints provide a “strong reason for refusing the development proposed” (Para 11d (i) NPPF 2024). Given the more limited constraints associated with Grey Belt land, it is considered that any potential environmental impacts can be effectively mitigated via S106 contributions. The exclusive reliance on brownfield land within Option 1 delivers		

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								will “ensure that there is sufficient employment land and commercial floorspace” without having an employment floorspace target against which delivery can be measured. For this reason, the plan cannot be considered positively prepared and in line with national policy. 2.6 Inner London also object to the assertion in the supporting text that there will be a surplus of employment land, particularly industrial									only half of the borough’s housing requirement and is founded on flawed and outdated evidence. By contrast, Option 2a offers a more balanced and deliverable strategy, enabling the release of limited Grey Belt sites (such as Land South of Charfleet s) that are less environmentally constrained, well-related to the borough’s most sustainable settlement, and capable of accommo		

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								land over the plan period. Paragraph 6.36 states that “data 4 on employment growth indicates that there will be a small surplus of employment land arising over the plan period of circa 2ha and that this, added to the extant planning consent for a 7.5ha employment scheme at West Canvey, has the potential to result in an overall surplus of 9.5ha of employment land over the plan period”. 2.7 Contrary to the findings of									dating both housing and employment growth.		

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								the Local Plan Evidence, Iceni's review local commercial property market dynamics (attached at Appendix A) reveals a critical shortage of industrial space in Castle Point rather than a surplus. It finds that, as of September 2025, the industrial vacancy rate in Castle Point is a very low 1.7% which is significantly below Essex (7.0%) and the UK (5.5%). An optimal vacancy rate for a healthy industrial market is typically 5-											

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								10% to allow for market churn and business expansion. 2.8 This low vacancy rate indicates high demand for industrial floorspace in Castle Point and suggests that that current and previous market activity has been suppressed due to a lack of supply, a trend that has persisted historically , except for a brief rise in 2023. Currently, there are only 8 available industrial properties across the district, totalling 4,800											

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								sq.m., with a majority being pre-1985 and unlikely to meet modern occupier requirements. There is a distinct lack of modern stock, especially for mid-sized businesses, with only one modern unit built in 2020 at Amber Industrial Park. The Thamesview 130 development is close to completing and is nearly fully let – showing that more modern employment space within the borough is in demand. 2.9 Based on a 10-year trend											

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								of average industrial net absorption , Icenis analysis suggests an industrial need of 11.9ha for Castle Point for the 2023-43 period, including a 5-year buffer, contrasting sharply with the draft Local Plan's projected surplus. 2.10 The economics note concludes that the Employment Topic Paper's reliance on a baseline labour demand model alone has likely significantly underestimated the need for employment											

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								floorspace , particularly for industrial uses, and therefore is neither justified or positively prepared as per paragraph 36 of the NPPF. It states that planning for additional modern business space, which is sustainable and capable of accommodating automation and modern business needs, is crucial for economic growth and diversification in Castle Point and that the current stock restricts inward investment and, by											

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								extension, the economic prospects of the wider authority and its residents.											
0332 - 0002	Agent	Corin	Williams	Iceni OBO The Inner London Group		E1	No	Inner London agree with the general principles of Policy E1 and E2 which seek to increase jobs by increasing the amount of high-quality employment space within the Borough but disagree with the			Whilst Inner London understand that the Council seek to improve these areas, there is no consideration as to where the current occupants will move to whilst the employment areas are being redeveloped. The Iceni Economic Note finds that this has been compounded by the fact that “no allowance has been made for replacement demand which considers the replacement of stock lost to other uses and the need to replace aging stock. Industrial and warehousing stock typically have a lifecycle of 30-40 years and so an allowance should be made to replace a proportion of pre-2000s stock which will become obsolete during the course of Plan Period.”. It	Inner London request that the employment need is recalculated and that a separate policy be added to guide the development of land that is outside existing employment areas				B	<u>Policies E1 and E2</u> Agree with the general principles of Policy E1 and E2 which seek to increase jobs by increasing the amount of high-quality employment space within the Borough but	Policies E1 and E2 Noted As set out in paragraph 14.14 'A review of the Borough's stock of employment land was undertaken in the Economic Sites Review 2024 to identify what opportunities exist to increase economic productivity. It identified that there are three principal sites that constitute the current and potential future strategic employment land supply:	N

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								soundness of the approach which focuses new commercial provision exclusively towards existing employment designations and town centre sites. 2.18 Paragraph 14.10 of the supporting text confirms that these policies have been based on the findings of the Experian Economic Demand forecast for Castle Point September 2024 which states that “there is a net demand of 4,000m2			stands to reason that the Council will need to “decant” existing occupiers to free up for redevelopment meaning that additional 7 floorspace will be required. By having a 0ha employment need over the next 17 years, the council is not planning for this identified need and as a result is not positively prepared and is therefore unsound.	or town centres.					disagree with the soundness of the approach which focuses new commercial provision exclusively towards existing employment designations and town centre sites. The supporting text confirms that these policies have been based on the findings of the Experian Economic Demand forecast for Castle Point September 2024 which states that “there is a net demand of	- Charfleets Trading Estate is a large set of industrial estates in the west of Canvey Island. This area is currently growing, and there is further potential for investment in the site which could drive intensification, increasing floorspace and jobs across the area. - Manor Trading Estate is a large industrial site in north Benfleet. There is high occupancy on the site, despite relatively poor infrastructure, notably the access to and around the site. - Stadium Way, Rayleigh Weir, is a smaller industrial estate with excellent occupation rates and limited opportunity for intensification. '	

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								of additional office floorspace in the Borough, but a small shrinkage in the demand for new land for industrial uses and warehousing growth is negligible”. As established by the Iceni Economic Note, these figures are based upon a baseline labour demand model which has significantly underestimated the need for employment space within the Borough, particularly for industrial uses, and that the									4,000m2 of additional office floorspace in the Borough, but a small shrinkage in the demand for new land for industrial uses and warehousing growth is negligible”. As established by the Iceni Economic Note (attached separately), these figures are based upon a baseline labour demand model which has significantly underestimated the need for employment space within the Borough, particularl		

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								Council should be planning for a minimum of 11.9ha of employment space over the plan period to meet needs. 2.19 Given the flaws in the supporting evidence, the Council needs to reassess whether it is a realistic prospect to accommodate 11.9ha employment demand within the existing employment areas (namely, Charfleets Trading Estate, Manor Trading Estate and Stadium Way). Paragraph 14.15 of									y for industrial uses, and that the Council should be planning for a minimum of 11.9ha of employment space over the plan period to meet needs The Council needs to reassess whether it is a realistic prospect to accommodate 11.9ha employment demand within the existing employment areas (namely, Charfleet s Trading Estate, Manor Trading Estate and Stadium		

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								the plan recognises the current condition of these areas stating that “At present the Borough’s Strategic Employment Areas are well occupied, but of generally poor quality in terms of environment. The building stock is generally poor, except for new development to the south of Roscommon Way (the Inner London development)”. A further review of these sites has found them to be densely packed and comprised mostly of									Way). Roscommon Way, Canvey Island Review of Employment Land Needs evidence attached separately		

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								small units with limited yard / parking space. Taking in respect of the Borough-wide available supply, the Iceni Economics Note states that “there is just one modern unit built in 2020 at Amber Industrial Park. Overall, there is a distinct lack of modern stock available in Castle Point. There are no options for mid-size businesses looking to move”.											

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0332 - 0003	Agent	Corin	Williams	Iceni OBO The Inner London Group		GB1	No	Inner London object to Policy GB1 on the grounds that it is not consistent with national policy is therefore unsound in accordance with Paragraph 36(d) of the NPPF. Point 1 of the policy states that “Development with the Green Belt, as defined on the policies map, will not be supported in line with the NPPF”. This is an inaccurate reading of national policy which actually states that development in the Green Belt is inappropriate	No	Consistent with National Policy	Policy GB1 fails to acknowledge the differences between inappropriate and not inappropriate development in the Green Belt and the fact that when development is proposed which is inappropriate, it will not be permitted except where a Very Special Circumstances case is demonstrated. Another way in which development can be regarded as not inappropriate in the Green Belt is if it is located on land which meets the definitions of Grey Belt and the criteria set out at NPPF Paragraph 155. Again, there is no reference to Grey Belt land in this policy, only in the supporting text, where a short description of NPPF Paragraph 155 is provided. 2.24 Castle Point is required to review the Green Belt as part of the Local Plan process and identify exceptional circumstances which justify changes to Green Belt boundaries (Paragraph 147 of the NPPF). Paragraph 146 of the NPPF states that Exceptional circumstances include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means [emphasis added]. As has been established by this response and its supporting Appendices, there is a proven shortfall between the council’s identified housing need and the target set out in the draft plan of 5,721 and an anticipated shortfall of 11.9ha of employment land – established by Appendix A. 2.25 Policy GB1					B	<u>Policy GB1 – Development affecting the Green Belt</u> Object to Policy GB1 on the grounds that it is not consistent with national policy is therefore unsound in accordance with Paragraph 36(d) of the NPPF. Point 1 of the policy states that “Development with the Green Belt, as defined on the policies map, will not be supported in line with the NPPF”. This is an inaccurate reading of	Grey Belt assessment of Land south of Charfleets noted. Policy GB1 – Development affecting the Green Belt Development decisions will be informed by consideration of the NPPF in its entirety. 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 capacity of the highway network in	N

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								ate unless one of the exceptions outlines in paragraph 154 applies.			needs to be amended to clearly explain that this protection should only be extended to land which contributes strongly to purposes (a), (b) and (d) as set out in Paragraph 143 of the NPPF. As outlined in the introduction of these representations, the Land South of Charfleets site (Parcel GB3 / Site 39926) was assessed by the latest Green Belt Assessment to make a weak / moderate contribution to purpose (a), a weak contribution to purpose (b) and a moderate contribution to purpose (c). As such, the site is listed in Table 12 of the Green Belt Assessment as being “potential Grey Belt upon consideration of Green Belt purposes a) and b)” which makes it a prime candidate to be released for development in terms of having an impact on the wider Green Belt. Iceni has undertaken a full Grey Belt Review of the site which speaks to these points and is attached at Appendix B. Policy GB1 fails to recognise that Green Belt parcels can vary in terms of their contributions and appropriateness for development, instead stating that all development on Green Belt, regardless of its assessment in the Green Belt Review, is inappropriate. In doing this it does not align with national policy and therefore must be found unsound.						national policy which actually states that development in the Green Belt is inappropriate unless one of the exceptions outlines in paragraph 154 applies. Grey Belt assessment of Land south of Charfleets attached separately.	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. 2018 Green Belt Assessments still form part of the evidence and considered wider areas.	

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0332 - 0004	Agent	Corin	Williams	Iceni OBO The Inner London Group		ENV1	No	Inner London support the broad intentions of policy ENV1, especially the aims for all development to contribute positively towards creating a visually attractive environment. Point 2 however, which requires all development proposals to “seek to protect and enhance key natural / semi-natural and historical features” is considered to put an unnecessary burden on developments and should only be required	No	Positively Prepared	The majority of proposals are already required to provide a 10% Biodiversity net gain enhancement, a figure that the Council seeks to increase to 20% in draft policy ENV3. Requiring all developments to make enhancements to key natural / semi – natural and historical features as well as provide a 20% uplift to biodiversity is considered unreasonable and should only be required where feasible. As such, the existing policy is likely to discourage development by unduly impacting their viability and deliverability and therefore cannot be considered positively prepared or sound in accordance with the NPPF.					B	<u>Policy ENV1 – Protecting and Enhancing the Landscape and Landscape Features</u> Inner London support the broad intentions of policy ENV1, especially the aims for all development to contribute positively towards creating a visually attractive environment. Point 2 however, which requires all development proposals to “seek to protect and enhance key natural / semi-natural	The Plan accords with the NPPF overarching objectives, including to 'Protect and enhance our natural, built and historic environment' (NPPF 8c). NPPF paragraph 20 is clear that strategic policies should ensure 'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure' and paragraph 136 is clear that existing trees should be retained wherever possible. Public authorities have a legal duty under the Environment Act 2021 to consider what they can do to conserve and enhance biodiversity as part of their decision-making. This includes both protecting existing features and working to improve their condition. In line with national policy, statutory bodies emphasise the retention, conservation, and enhancement of	N

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								where feasible.									and historical features” is considered to put an unnecessary burden on developments and should only be required where feasible. The majority of proposals are already required to provide a 10% Biodiversity net gain enhancement, a figure that the Council seeks to increase to 20% in draft policy ENV3. Requiring all developments to make enhancements to	existing and historic features.	

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																	key natural / semi – natural and historical features as well as provide a 20% uplift to biodiversity is considered unreasonable and should only be required where feasible. As such, the existing policy is likely to discourage development by unduly impacting their viability and deliverability and therefore cannot be considered positively prepared or sound in accordan		

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																	ce with the NPPF		
0332 - 0005	Agent	Corin	Williams	Iceni OBO The Inner London Group		ENV3	No	Similarly to the response to Policy ENV1, Policy ENV3 and its requirement for greenfield developments to deliver a 20% biodiversity uplift is considered to put a significant strain on the deliverability of schemes and will inevitably stop them coming forward.	No	Positively Prepared	Inner London would like to ask when evidence justifying this position will be published and whether this option has been fully viability tested. Without this supporting evidence the policy is unsound on the ground of it stifling development and therefore not being positively prepared.					B	<u>Policy ENV3 – Securing Nature Recovery and Biodiversity Net Gain</u> Similarly to the response to Policy ENV1, Policy ENV3 and its requirement for greenfield developments to deliver a 20% biodiversity uplift is considered to put a significant strain on the deliverability of schemes and will inevitably stop them coming forward.	As set out in paragraph 18.29 'Local areas can set a higher requirement through their plans where it can be demonstrated it would be deliverable. Viability testing has indicated it is possible to secure 20% biodiversity net gain on greenfield sites, and this requirement has been set for those sites to improve local contribution to the local Nature Recovery network identified through the Local Nature Recovery Strategy for Essex'.	N

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																	Inner London would like to ask when evidence justifying this position will be published and whether this option has been fully viability tested. Without this supporting evidence the policy is unsound on the ground of it stifling development and therefore not being positively prepared.		
0332 - 0006	Agent	Corin	Williams	Iceni OBO The Inner London Group		T2		Policy T2 confirms that transport and highways improvements will be delivered in line with the				On this basis, Inner London request that Scenario 2, which reflects development across				B	<u>Policy T2 – Highway Improvements</u> Policy T2 confirms that transport and highways improvem	Preference noted	N

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								Infrastructure Delivery Plan (IDP) 2025. The IDP is a critical document as it models three potential growth scenarios, ranging from development limited to the urban area (Scenario 1) to options which consider a broader distribution of sites informed by the emerging Green Belt Review (Scenarios 2 and 3). Importantly, the IDP acknowledges that the infrastructure measures needed to support higher levels of				both urban brownfield and a limited number of Green Belt / Grey Belt sites, is fully reviewed in parallel with Option 2a for Policy SP3 within the Sustainability Appraisal. Scenario 2 represents a balanced and deliverable approach to meeting a greater share of the borough's objectively assessed housing and employment needs while ensuring that transport infrastruc					ents will be delivered in line with the Infrastructure Delivery Plan (IDP) 2025. The IDP is a critical document as it models three potential growth scenarios, ranging from development limited to the urban area (Scenario 1) to options which consider a broader distribution of sites informed by the emerging Green Belt Review (Scenarios 2 and 3). Importantly, the IDP acknowledges that the		

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								growth have been identified, meaning that growth in excess of that currently planned for is not only feasible but could be supported in transport terms.				ure planning is aligned to accommodate such growth.					infrastructure measures needed to support higher levels of growth have been identified, meaning that growth in excess of that currently planned for is not only feasible but could be supported in transport terms. On this basis, Inner London request that Scenario 2, which reflects development across both urban brownfield and a limited number of Green Belt / Grey Belt sites, is fully		

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																	reviewed in parallel with Option 2a for Policy SP3 within the Sustainability Appraisal. Scenario 2 represents a balanced and deliverable approach to meeting a greater share of the borough's objectively assessed housing and employment needs while ensuring that transport infrastructure planning is aligned to accommodate such growth.		

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0332 - 0007	Agent	Corin	Williams	Iceni OBO The Inner London Group		C4					2.3 Inner London agrees with the broad intentions of the draft policy but objects to the policy on the basis that it is not compatible with the existing uses and permissions that are located within it. Point 7 states that the Master Plan will provide “a programme of renewal of the existing building stock at West Canvey and an overall increase in commercial floorspace of 10%” but fails to recognise that that a strategy which seeks only to renew existing provision will mean that existing businesses will need to be displaced while the construction works take place. This means that, despite having aims to “increase industrial floorspace by 10%”, this policy is likely to reduce industrial provision in the short term, especially as no additional employment land has been identified in the emerging plan to “decant” these business to while the old stock is renewed, and noting the critically low vacancy levels in Castle Point highlighted in our previous representations. 2.4 It is for these reasons that the policy should extend the “Broad Location” allocation to include the sites identified in Option 2a of the Sustainability Appraisal as being suitable for “limited release”. The 5 sites it identifies will provide additional land to meet a greater percentage of the borough’s unmet housing and employment need as well as providing well located, sustainable locations to which existing businesses at Charfleets Industrial Park can	2.5 Additionally, the policy text for Policy C4 makes no reference to the extant, permitted development at the Northwick Site (15/0293/RES), despite this land being included within the wider allocation . This omission creates ambiguity regarding the intended role of the Northwick Site within the allocation and risks implying that alternative uses identified in Policy C4 e.g. residential and communit						Agrees with the broad intentions of policy C4 Objects that the proposal conflicts with existing uses Displacement while construction works are taking place Extend the broad location to include the 5 sites identified in option 2a of the SA provide additional floorspace Remove inclusion of alternative uses ie residential and community uses. Exclude development at the Northwick site	Support noted. Conflicts with existing uses Policy C4 seeks a masterplan approach that will provide a land use strategy that identifies how a mix of uses comprising residential, community, commercial and industrial can be accomodated whilst ensuring residential amenity and avoiding harm to economic activity. Displacement during works This broad location is not likely to be developed all in one go, taking a strategic look at the whole area allows a comprehensive and hollistic approach to regeneration however the implementation is likely to be done in phases. The logistics of the construction work and the impact that this has on existing occupiers will be detailed in a construction environment management plan prepared and submitted to the council in	N

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											be “decanted” while the old stock is renewed. Without these proposed changes, Policy C4 will not be effective or positively prepared, and therefore the plan will not be sound.	y uses, are appropriate on this land, contrary to the established planning position. 2.8 The omission of the Northwick Site’s established role and permitted development within Policy C4 is therefore misleading and therefore “unjustified” in the tests for soundness. It inaccurately suggests that the residential and community uses proposed elsewhere within the allocation may also be achievable or					(15/0293/RES) as the policy does not reflect the existing permission	accordance with policy SD6. Extend the Broad Location The sustainability appraisal details why these options have not been selected. It should also be noted that it is green belt land which has many constraints as detailed in the Housing Capacity Topic Paper Remove other uses The policy is intended to bring regeneration and renewal to the area which will optimise urban land use and improve the quality of the urban environment and public realm. This includes ensuring that the area has public services and community uses as well as residential development. Exclude Northwick site from the broad location This site has been included within the broad location so that effective links can be created within the area.	

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												supported on the Northwick Site, when in fact no such uses are deliverable or being promoted. 2.9 Policy C4 should be amended to explicitly support employment uses, consistent with the extant permission, at the Northwick Site. This would ensure the policy accurately reflects the site's development context and avoids creating false expectations or policy conflict.							

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0370 - 0001	Individual	Nicholas	Williams		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 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 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	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.							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 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	

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																		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 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	

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																		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. 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 capacity of the highway network in and around Castle	

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																		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. 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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0559 - 0001	Individual	Terry	Williams		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 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 procedure s	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 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	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.						Need for a third road to be included in the plan.	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 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.	

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																		Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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 capacity of the highway network in	

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																		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. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey,	

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																		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 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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0559 - 0002	Individual	Terry	Williams		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 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 has been identified through the Open		N

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																		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.	
0559 - 0003	Individual	Terry	Williams		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
0148 - 0001	Individual	Paul	Williamson		Yes	SP3	No	I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider	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	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt	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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and

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								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.			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. Canvey Island doesn't have the infrastructure to deal with 3000+ new homes. As it is there is very limited doctors places and very difficult to get a dentist. The current road network would not cope with the extra traffic.						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	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.	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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																	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.		
0148 - 0002	Individual	Paul	Williamson		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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0575 - 0001	Individual	James	Willis		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 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 procedure s	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 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	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.						Need for a third road to be included in the plan.	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 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.	

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																		Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). 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 capacity of the highway network in	

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																		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. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey,	

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																		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 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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0575 - 0002	Individual	James	Willis		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 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 has been identified through the Open		N

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																		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.	
0575 - 0003	Individual	James	Willis		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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1055 - 0001	Individual	Simon	Willis		Yes	HAD2	No	Leaves Castle Point vulnerable to government intervention. Should consider alternatives such as North West Thundersley (A130 corridor).	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 however 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	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 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	N

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											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. 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.								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 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	

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																		option 4) outlines why North West Thundersley was not preferred. 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 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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																		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. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD3	
1335 - 0001	Individual	Jame	Willis			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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1335 - 0002	Individual	Jame	Willis			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 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	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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																		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 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	

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																		why North West Thundersley was not preferred. 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 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	

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																		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. 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 design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1335 - 0003	Individual	Jame	Willis			C4					The number of Canvey West homes puts residents in the East		No				Development at West	The safety of all Castle Point residents is a priority	N

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											at risk with emergency evacuation procedures						Canvey will impact emergency evacuation procedures for those residents living at East Canvey	and has been considered within the Castle Point Plan	
0905 - 0001	Individual	Dave	Willison		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant ,	Support noted.	N
0085 - 0001	Individual	Clare	Wilson		Yes	Whole Plan	Yes	I consider the draft plan to be legally compliant	Yes		I consider the draft plan to be sound.		Not Stated		No		Castle Point Plan is sound and legally compliant ,	Support Noted	N
0079 - 0001	Individual	Steve	Wood		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	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	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	No		No	A	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	North-West Thundersley and 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.	N

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								land supply.			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.	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.					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	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.	

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																	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. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for		

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																	7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.		
0079 - 0002	Individual	Steve	Wood		Yes	C4	No		No	Justified, Consistent with National policy	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		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
0176 - 0001	Individual	Debbie	Wood		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.	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	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	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	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the

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								Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.			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.						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	circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	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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																	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.		
0176 - 0002	Individual	Debbie	Wood		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
0633 - 0001	Individual	Steve	Wood		Yes	SP3	No	3300 homes on Canvey is ridiculous. I do not believe for one	No	Positively prepared, Effective, Justified	As above. The whole thing is [REDACTED] and the people who decided on this is clearly [REDACTED]. Up to and including those at a national level.	There has been zero openness or consultation with	No	Not Answered	Not Answered	A	No public consultation or openness with the public	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg	N

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								minute that the people who are supposed to represent us fought for us. There is some form of corruption going on that favours the "mainland" at our expense.				the public.						18 consultation statement and reg 22 consultation statement.	
1369 - 0001	Individual	Terry	Wood			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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1369 - 0002	Individual	Terry	Wood			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 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	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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																		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 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	

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																		why North West Thundersley was not preferred. 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 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	

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																		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. 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 design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1369 - 0003	Individual	Terry	Wood			C4					The number of Canvey West homes puts residents in the East		No				Development at West	The safety of all Castle Point residents is a priority	N

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											at risk with emergency evacuation procedures						Canvey will impact emergency evacuation procedures for those residents living at East Canvey	and has been considered within the Castle Point Plan	
1441 - 0001	Agent	Rupert	Wood	Thames Enterprise Park Ltd	Yes	Forward	Yes		No	Consistent with National Policy	The Vision should be amended to ensure consistency with the National Planning Policy Framework (NPPF), particularly its emphasis on effective cooperation between local authorities.	As set out previously in our response to the Issues & Options Regulation 18 Consultation, we welcome the emphasis on creating a well balanced community, combining housing, improved transport network and employment opportunities. However, the vision should be amended	No				As set out previously in our response to the Issues & Options Regulation 18 Consultation, we welcome the emphasis on creating a well balanced community, combining housing, improved transport network and employment opportunities. The Vision should be amended to ensure	Cooperation with neighbouring authorities is addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. Castle Point's wider economic context is addressed in Ch 14.	N

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												to ensure consistency with the NPPF, particularly its emphasis on effective cooperation between local authorities. This can be achieved by incorporating a clear commitment to improving connectivity with employment sites across the wider regional economic area, including Thurrock. Strengthening transport links between Castle Point and nearby employment centres will make it easier					consistency with the National Planning Policy Framework (NPPF), particularly its emphasis on effective cooperation between local authorities. This can be achieved by incorporating a clear commitment to improving connectivity with employment sites across the wider regional economic area, including Thurrock. Strengthening transport links between Castle Point and nearby employment		

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												for residents to access jobs locally. Addressing these strategic cross-boundary issues is essential to meet NPPF requirements for sustainable development. The Vision should highlight the importance of building strong partnerships with neighbouring authorities, such as Thurrock, to tackle shared challenges around transport, housing, and infrastructure. In addition, Castle Point					ent centres will make it easier for residents to access jobs locally. Addressing these strategic cross-boundary issues is essential to meet NPPF requirements for sustainable development. The Vision should highlight the importance of building strong partnerships with neighbouring authorities, such as Thurrock, to tackle shared challenges around transport, housing, and infrastruc		

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												should seek to maximise opportunities relating to the estuary as an economic growth opportunity, recognising its potential for trade and associated employment benefits.					ure. In addition, Castle Point should seek to maximise opportunities relating to the estuary as an economic growth opportunity, recognising its potential for trade and associated employment benefits.		
1441 - 0002	Agent	Rupert	Wood	Thames Enterprise Park Ltd	Yes	C5	Yes		No	Consistent with National Policy	Policy C5 identifies the need to improve access to and around Canvey Island, but it should be strengthened to ensure the Local Plan delivers sustainable and strategic connectivity in line with the NPPF.	Improving access to and through the wider South Essex region is critical for long-term economic vitality and quality of life. Current transport links are inadequate,	No				Policy C5 identifies the need to improve access to and around Canvey Island, but it should be strengthened to ensure the Local Plan delivers sustainable and	Access options to Canvey will be investigated in more detail in the forthcoming feasibility study.	N

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												contributing to congestion and limiting Canvey Island's potential for growth. To address this, the policy should include a clear commitment to upgrading the strategic road network, particularly the A130, which provides a key link between Canvey Island and surrounding areas. Enhancing this route will help alleviate congestion and improve access to employment opportunities in					strategic connectivity in line with the NPPF. Improving access to and through the wider South Essex region is critical for long-term economic vitality and quality of life. Current transport links are inadequate, contributing to congestion and limiting Canvey Island's potential for growth. To address this, the policy should include a clear commitment to upgrading the strategic road		

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												Thurrock and beyond. In addition to road improvements, expanding public transport services is essential. More frequent and reliable bus connections between Canvey Island, Basildon, and Thurrock would reduce car dependency and promote sustainable travel. Similarly, integrating cycling infrastructure would provide residents with viable alternatives, supporting carbon reduction					network, particularly the A130, which provides a key link between Canvey Island and surrounding areas. Enhancing this route will help alleviate congestion and improve access to employment opportunities in Thurrock and beyond. In addition to road improvements, expanding public transport services is essential. More frequent and reliable bus connections between Canvey Island,		

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												and healthier lifestyles. Rail Freight should also be highlighted as a key component to improve the movement of goods into and out of the region. This is essential for supporting sustainable logistics and reducing reliance on road transport. Investing in multimodal transport solutions will ensure Canvey Island remains well-connected and resilient to future growth					Basildon, and Thurrock would reduce car dependency and promote sustainable travel. Similarly, integrating cycling infrastructure would provide residents with viable alternatives, supporting carbon reduction and healthier lifestyles. Rail Freight should also be highlighted as a key component to improve the movement of goods into and out of the region. This is essential for supportin		

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												pressures . This approach will support economic development, environmental sustainability and social inclusion, aligning Policy C5 with NPPF requirements for sustainable and coordinated development. In addition, Castle Point should seek to maximise opportunities relating to the estuary as an economic growth opportunity, recognising its potential for trade, tourism and					g sustainable logistics and reducing reliance on road transport. Investing in multimodal transport solutions will ensure Canvey Island remains well-connected and resilient to future growth pressures . This approach will support economic development, environmental sustainability and social inclusion, aligning Policy C5 with NPPF requirements for sustainable and coordinat		

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												associated employment benefits.					ed development. In addition, Castle Point should seek to maximise opportunities relating to the estuary as an economic growth opportunity, recognising its potential for trade, tourism and associated employment benefits.		
1441 - 0003	Agent	Rupert	Wood	Thames Enterprise Park Ltd	Yes	C3	Yes		No	Not Stated			No				Policy C3 is legally compliant but not sound	Comment noted.	N

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0627 - 0001	Individual	Brooke	Woodberry		Yes	SP3	No	1. Flood Risk and Planning Law Canvey Island is a high-risk flood zone—much of the island lies below sea level and is protected by sea defences. National Planning Policy Framework (NPPF) requires: A Flood Risk Assessment (FRA) for all developments in flood zones. The Sequential Test to demonstrate that there are no reasonably available sites with a lower	No	Effective, Justified	Canvey hasn't been thought off compared to other areas where there is more room and infrastructure cause canvey hasn't good that and if there is an emergency or floods again like it did in 2014 where are the cemetery the coffins started to come e out of the ground cause of how much water it there and the fact that it takes most people hours to get home cause it all goes onto waterside roundabout		Yes	People need to say some that this isn't okay and if you don't see the impact of canvey you can't see the impact. Please note: It is the Inspector that will determine the most appropriate way to hear those who have indicated that they wish to	Not Answered		Canvey Island's development faces legal and practical risks due to its high flood vulnerability, environmental protections, infrastructure strain, and planning constraints. Housing proposals must comply with flood risk tests, environmental laws, and infrastructure planning duties. Non-compliance or misrepresentation can trigger judicial review, enforcement action, or liability	Policy C10 – Other Housing Site Allocations on Canvey Island This policy allocates residential sites across Canvey and directly engages with flood risk concerns. Responds to the objection: • Flood Risk Compliance: All sites must comply with the Sequential Test and, where applicable, the Exception Test, in line with the NPPF 2024. It references the Level 2 Strategic Flood Risk Assessment (SFRA), which includes site-specific flood mitigation requirements.	N

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								risk of flooding. The Exception Test, showing that the development is safe and provides wider sustainability benefits. ⚠ Legal risk: If housing is approved without proper compliance, it could be subject to judicial review or future liability if flooding damages property. --- ◇ 2. Environmental Law More development could						participate at the oral examination.			claims. Also Policy Policy SD2 - Non-Tidal Flood Risk Management directs growth away from areas of highest flood risk, unless robust mitigation and national tests (Sequential and Exception) are satisfied. • Requires site-specific Flood Risk Assessments and alignment with the Level 2 SFRA (July 2025).		

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								impact: SSSIs (Sites of Special Scientific Interest) Habitats Regulations if development affects protected species or wetlands Air and water quality obligations under the Environment Act 2021 ⚠ Legal risk: Breach of these can lead to injunctions , fines, or the requirement for mitigation plans. --- ◇ 3. Infrastructure & Capacity											

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								More homes mean more demand on: Drainage and sewage (already a concern in flood-prone areas) Roads, schools, healthcare Local authorities must show that adequate infrastructure is planned under the Town and Country Planning Act 1990 and the Localism Act 2011. --- ◇ 4. Local Plan and Judicial Review											

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								The Castle Point Borough Council Local Plan governs housing development. If new developments are inconsistent with the adopted plan, residents or interest groups may challenge decisions via judicial review. Past opposition to large-scale housing in Canvey has already led to tensions between the council and central government. --- ◇ 5.											

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								Insurance & Liability New housing in high flood-risk areas can be hard to insure. If councils or developers misrepresent risk, they could face liability claims.											
0732 - 0001	Individual	Rachael	Wratislaw		Yes	HAD4	Yes		No	Positively prepared	There is not room on this plot of land to build 114 homes unless they are very small homes with little to no gardens and no parking. People need private outdoor space which by fitting 114 homes on this plot would not achieve. 114 homes would mean a lot more children needing school places, where will these school places come from? 114 new homes means a lot more traffic on Scrub Lane	Move the junior school to this site instead and build new housing on that site. Or if there must be new housing carried	No	Not Answered	Not Answered	A	Objecting to Had4 due to: Traffic Parking capacity on Scrub Lane Loss of habitat to animals Disruption to students education	Traffic 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.	N

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											which is already a busy road for a residential street making it even more dangerous for families to live on. I am petrified of walking down the road with my young children when it gets busy that one of them will suddenly run into the road. There is a speed bump missing halfway along and cars speed up between these bumps. Parking for parents will become very difficult if this stretch of road is taken up by new housing making the area very busy and more dangerous for children and parents at drop off and pick up time. Additionally the impact of air quality from increased traffic using Scrub Lane will be bad for current and future residents. The impact of this development on the surrounding environment would mean loss of habitat for insects and small animals on this field. Whilst this development is being undertaken children's ability to concentrate in the infants school will be impacted not to mention the air quality and noise from such a development polluting air during play outside.	out here then limit it to no more than 30 new homes.												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. Loss of Habitat Any application for homes on this site will have to comply with ENV1 to ensure that all development proposals should contribute positively towards creating a visually attractive environment. Disruption to students education Any application for homes on this site will have to comply with policy SD6 which requires proposals to be submitted by a construction environment management plan to ensure that any adverse impacts of the development are sufficiently mitigated.	
0732 - 0002	Individual	Rachael	Wratislaw		Yes	INFRA 1	Yes		No	Positively prepared	There is no mention of relocating the library. Libraries are still important as they allow for equal access to knowledge (not just books but internet access), are community hubs for people of all ages and host things like Storytime's for children, reading	There needs to be a guaranteed space for a Hadleigh library in	No	Not Answered		A	Relocation of Hadleigh Library is necessary	Policy INFRA1 is included within the plan to make sure that the redevelopment of existing community facilities are only supported if a	N						

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											groups, workshops and other cultural activities, support literacy and education (summer reading challenges), cultural preservation of the local area, and also provide economic and social value.	the new development or relocation nearby; so that people can still access it by bus or car parking or by foot.						replacement/improvement to existing facilities are provided.	
0942 - 0001	Individual	Tim	Wratislaw		Yes	HAD4	Yes		No	Justified	The plan to add 114 new homes to this area of land, whilst meeting a national ask, doesn't take into account the already horrendous parking and general traffic conditions extant in the area. Taking the average number of vehicles per household being 2 per household, the plan seeks to add a further 228 vehicles into an already highly congested road. This is at the end of the development process. The traffic and parking issues during development of the site in question, with the additional heavy machinery and heavy vehicles required, will not only destroy the road and pavement surfaces, but render the route impassable for long periods congesting surrounding roads. This also doesn't take into account any works/incidents that frequently take place along the A13 which leads to Scrub Lane becoming a cut through and exacerbating traffic problems. Furthermore, there isn't the capacity at the local Infant and Junior schools, let alone	The modification would be to remove this site as an option for development and then to revise the plan to include the addition of further schools and medical facilities to cater for the increased population. Scrub Lane as a road cannot accommodate any more traffic than it	Yes	Not Answered	Not Answered	A	Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character Infrastructure Air quality 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.	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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											Dentists and GP surgeries, to accommodate the additional need that 114 extra homes will require. The infrastructure and locale of each school (Infants and Juniors) means it is next to impossible to build the additional classrooms that would be required. This leaves the final issue I have with this part of the plan, and that is the effect on the air quality right next to an Infant and Nursery school. The amount of pollution produced by construction vehicles right next to the school, with children playing outside at frequent points in the day, is an intolerable idea and causes a long-term threat to the children's health!	already has to contend with, which also raises questions on the viability written into the plan identifying Scrub Lane as ripe for addition of a cycle lane - the road is just not big enough to cope!						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 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	

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																		Borough suggest that air quality is improving.	

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0022 - 0001	Individual	Carly	Wright		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	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	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	Not Stated		No			Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • 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	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 • 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. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery	N

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								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			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 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)	ities, 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. Essex County Council is investing in infrastructure and would be legally obliged to					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.	mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								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			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 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	cooperate . North West Thundersley offers a strategic opportunity for sustainable growth.							

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								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			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,								

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								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 constructiv			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. 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								

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								e 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			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, 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								

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								ire 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			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 demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous								

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								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 undermini			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 Fairglens 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,								

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								ng 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			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								

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								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.			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. 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								

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								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			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.								

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								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;											

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								they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.											
0022 - 0002	Individual	Carly	Wright		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	No	Not Stated			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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								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											

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								risks being found unsound on procedural grounds alone.											
1169 - 0001	Individual	Heleen	Wright			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 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	<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> All reasonable option sites were considered in the Strategic Land Availability	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.									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	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> 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	

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																	geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1169 - 0002	Individual	Heleen	Wright			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1169 - 0003	Individual	Heleen	Wright			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
0446 - 0001	Individual	Simon	Wylde		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant ,	Support noted.	N
0448 - 0001	Individual	Johanna	Wylde		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant ,	Support noted.	N

ID Ref	Individual/Organisation/Age nt?	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
0449 - 0001	Individual	James	Wylde		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant ,	Support noted.	N
0450 - 0001	Individual	Daniel	Wylde		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant ,	Support noted.	N
0467 - 0001	Individual	Diane	Wylde		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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0636 - 0001	Individual	Joanne	Yalcin		Yes	SP3	No	The building of homes on Canvey island, would be a disaster. I believe that for the island only a certain amount of houses per hectares are permitted. I think the amount suggested goes well over the amount recommended. Now there would be a lot more vehicles on the road and no planned improvements to roads or a 3rd road off, which does not exit from the same roundabout as the existing ones. On a normal day there	No	Positively prepared, Effective, Justified	The building of more homes on Canvey island, would be a disaster. I believe that for the island only a certain amount of houses per hectares are permitted. I think the amount suggested goes well over the amount recommended. There would also be a significant increase of vehicles on the road and no planned improvements to roads or a 3rd road off, which does not exit from the same roundabout as the existing 2 routes. On a normal day there is a lot of traffic, adding to this is dangerous. When an accident happens on one road the whole island is gridlocked, and it causes roads onto and off the island to be at a standstill. If there was ever an emergency at either one of the two COMAH sites, the island would grind to a halt, and that would put thousands of lives at risk. Doctors and dentists are already full, so where would all these extra people go? We only have 2 secondary schools on the island, which are full. Where would all the extra children go? (If they had to attend schools off the island then that would cause a lot more strain on the already heavy rush hour traffic. Drainage/sewage is a problem on Canvey. It would not be able to cope with all the extra amount of housing. Flooding is an issue, when it rains heavily the drainage system cannot cope. So removing more green space for concrete will cause much more flooding to probably the existing	I believe where the housing goes needs to be looked at. Canvey cannot cope with that amount of housing. Infrastructure can't cope, drainage systems can't cope, Doctors can't cope, schools can't cope. The amount of houses per hectare needs looking at.	No	Not Answered	Not Answered	A	Canvey Island cannot take the amount of homes proposed lack of infrastructure Safety due to COMAH and evacuation concerns Flood risk concerns	Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). 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 identifies three projects which	N

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								is alot of traffic, adding to this is dangerous . When there is an accident on one road on canvey, it grinds to a halt, including most roads leading on and off the island. If there was ever a emergency at either one of the two COMAH sites, the island would be gridlocked and that would put thousands of lives at risk. Doctors and dentists are already full, so where would all these extra people go? We only			houses already here and most probably the new ones. To be honest I feel scared living here on the island, because if there was an emergency I believe I would have little to no chance of getting off the island now, so with that amount of extra housing, I dread to think!							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. COMAH sites 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 have HSE consultation zones identified around them, in which it is expected that other development is controlled to limit	

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								have 2 secondary schools on the island, which are full. Where would all the extra children go? (If they had to attend schools off the island then that would cause a lot more strain on the already heavy rush hour traffic. Drainage is a big problem on Canvey now. It would not be able to cope with all the extra amount of housing. Flooding is an issue, when it rains heavily the drainage system cannot cope. So removing										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 development is proposed. 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. Policy SD8	

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								more green space for concrete will cause much more flooding to probably the existing houses already here and most probably the new ones. To be honest I feel scared living here on the island, because if there was an emergency I believe I would have little to no chance of getting off the island now, so with that amount of extra housing, I dread to think!										‘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 health and safety grounds’. Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/ Flood Risk 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	

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																		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.	
0752 - 0001	Individual	Jason	Young		Yes	Whole Plan	Yes		No	Consistent with national policy			Yes	Not Answered	Not Answered		Not consistent with national policy	Comment Noted.	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
1158 - 0001	Individual	Corinne	Young			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1158 - 0002	Individual	Corinne	Young			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1158 - 0003	Individual	Corinne	Young			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

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
1283 - 0001	Individual	Dawn	Young			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	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	<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> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley Northwest</u>	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.									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	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> 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.	

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																	urban homes for Canvey is not resident led		
1283 - 0002	Individual	Dawn	Young			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									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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								from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1283 - 0003	Individual	Dawn	Young			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
1085 - 0001	Individual	Suzanne	Zammit		Yes	ENV1	Yes		No	Positively prepared	There should be more care to protect trees by putting TPOs on all oaks in the areas where building may take place so that we do not lose these precious old trees and so that we preserve Green spaces and biodiversity	There should be more care to protect trees by putting TPOs on all oaks in the areas where building may take place so that we do	Yes	Not Answered	Not Answered		More care to protect trees by putting TPOs on all oak trees	Comments noted.	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
												not lose these precious old trees and so that we preserve Green spaces and biodiversity							
0002 - 0001	Duplicate representation received. See representation 0627-0001.												Yes						
0003 - 0001	Duplicate representation received. See representation 0001-0001.																		
0130 - 0001	Removed as no permission given to publish.												Not Stated		No				
0130 - 0002	Removed as no permission given to publish.												Not Stated		No				
0186 - 0001	ERROR																		
0187 - 0001	ERROR																		
0188 - 0001	ERROR																		
0189 - 0001	ERROR																		

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0231 - 0001	ERROR																		
0232 - 0001	ERROR																		
0233 - 0001	ERROR																		
0234 - 0001	ERROR																		
0235 - 0001	ERROR																		
0236 - 0001	ERROR																		
0237 - 0001	ERROR																		
0238 - 0001	ERROR																		
0239 - 0001	ERROR																		
0266 - 0001	Supporting Evidence provided to supplement representation. See representation 0992-0001 to 0992-0005.																Submitted a Vision and Masterplan Document in relation to Land at Solby Wood Farm:	Noted.	N
0272 - 0001	Duplicate representation Received - Please see 1002-0001 to 1002-0006.																		

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0297 - 0001	Duplicate representation received. See representation 1056-0001.																		
0307 - 0001	Duplicate representation received. See representation 1086-0001.																		
0308 - 0001	Duplicate representation received. See representation 1087-0001.																		
0314 - 0001	Supporting Evidence provided to supplement representation. See representation 1097-0001.																		
0324 - 0001	Duplicate representation received - Please see 0269-0001 to 0269-0004.																		
0342 - 0001	Duplicate representation received. See representation 1020-0001 to 1020-0009.																		
0344 - 0001	Duplicate representation received. See representation 0271-0001.																		

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0350 - 0001	Duplicate representation received. See representation 0278-0001.																		
0355 - 0001	Duplicate representation received. See representation 0768-0001.																		
0356 - 0001	Duplicate representation received. See 0051-0001.								No										
0424 - 0001	Unable to process due to lack of contact details																		
0493 - 0001	Removed as no permission given to publish.																		
0493 - 0002	Removed as no permission given to publish.																		
0493 - 0003	Removed as no permission given to publish.																		
0506 - 0001	Removed as no permission given to publish.																		
0506 - 0002	Removed as no permission given to publish.																		
0506 - 0003	Removed as no permission given to publish.																		

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0510 - 0001	Removed as no permission given to publish.																		
0510 - 0002	Removed as no permission given to publish.																		
0510 - 0003	Removed as no permission given to publish.																		
0514 - 0001	Removed as no permission given to publish.																		
0514 - 0002	Removed as no permission given to publish.																		
0514 - 0003	Removed as no permission given to publish.																		
0515 - 0001	Removed as no permission given to publish.																		
0515 - 0002	Removed as no permission given to publish.																		
0515 - 0003	Removed as no permission given to publish.																		
0517 - 0001	Removed as no permission given to publish.																		
0517 - 0002	Removed as no permission given to publish.																		

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0517 - 0003	Removed as no permission given to publish.																		
0527 - 0001	Removed as no permission given to publish.																		
0527 - 0002	Removed as no permission given to publish.																		
0527 - 0003	Removed as no permission given to publish.																		
0529 - 0001	Removed as no permission given to publish.																		
0529 - 0002	Removed as no permission given to publish.																		
0529 - 0003	Removed as no permission given to publish.																		
0535 - 0001	Removed as no permission given to publish.																		
0535 - 0002	Removed as no permission given to publish.																		
0535 - 0003	Removed as no permission given to publish.																		
0546 - 0001	Removed as no permission given to publish.																		

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0546 - 0002	Removed as no permission given to publish.																		
0546 - 0003	Removed as no permission given to publish.															A			
0553 - 0001	Removed as no permission given to publish.																		
0553 - 0002	Removed as no permission given to publish.																		
0553 - 0003	Removed as no permission given to publish.																		
0556 - 0001	Removed as no permission given to publish.																		
0556 - 0002	Removed as no permission given to publish.																		
0556 - 0003	Removed as no permission given to publish.																		
0558 - 0001	Removed as no permission given to publish.																		
0558 - 0002	Removed as no permission given to publish.																		
0558 - 0003	Removed as no permission given to publish.																		

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0564 - 0001	Removed as no permission given to publish.																		
0564 - 0002	Removed as no permission given to publish.																		
0564 - 0003	Removed as no permission given to publish.																		
0565 - 0001	Removed as no permission given to publish.																		
0565 - 0002	Removed as no permission given to publish.																		
0565 - 0003	Removed as no permission given to publish.																		
0566 - 0001	Removed as no permission given to publish.																		
0566 - 0002	Removed as no permission given to publish.																		
0566 - 0003	Removed as no permission given to publish.																		
0570 - 0001	Removed as no permission given to publish.																		
0570 - 0002	Removed as no permission given to publish.																		

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0570 - 0003	Removed as no permission given to publish.																		
0579 - 0001	Removed as no permission given to publish.																		
0579 - 0002	Removed as no permission given to publish.																		
0579 - 0003	Removed as no permission given to publish.																		
0588 - 0001	Removed as no permission given to publish.																		
0588 - 0002	Removed as no permission given to publish.																		
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0593 - 0001	Removed as no permission given to publish.																		
0593 - 0002	Removed as no permission given to publish.																		
0593 - 0003	Removed as no permission given to publish.																		
0602 - 0001	Removed as no permission given to publish.																		

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0602 - 0002	Removed as no permission given to publish.																		
0602 - 0003	Removed as no permission given to publish.																		
0606 - 0001	Removed as no permission given to publish.																		
0606 - 0002	Removed as no permission given to publish.																		
0606 - 0003	Removed as no permission given to publish.																		
0615 - 0001	Removed as no permission given to publish.																		
0615 - 0002	Removed as no permission given to publish.																		
0615 - 0003	Removed as no permission given to publish.																		
0616 - 0001	Removed as no permission given to publish.																		
0616 - 0002	Removed as no permission given to publish.																		
0616 - 0003	Removed as no permission given to publish.																		

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0621 - 0001	Duplicate representation received. See 0492-0001 to 0492-0003.																		
0692 - 0001	Duplicate representation received. See representation 1098-0001.																		
0824 - 0001	Representation withdrawn																		
0880 - 0001	Unable to process due to lack of contact details provided.																		
0948	Duplicate Representation Received. See 0947-0001 to 0947-0010.																		
0987 - 0001	Duplicate representation received. See representation 0988-0001 to 0988-0010.																		

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0988 - 0001	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	SP3	No		No	Positively prepared, Effective, Justified, Consistent with national policy	2. Policy SP3 – Meeting Development Needs The Housing Requirement 2.1. The new Plan confirms that the starting point for assessing local housing need is the standard methodology, which establishes a housing requirement for Castle Point of 686 dwellings per annum, equating to 11,662 homes over the Plan period. This is agreed as being the most recent figure, and it is welcomed that the Council recognises this is a variable figure due to changes in affordable housing ratios and housing stock which inform the figure. 2.2. However, this is only the starting point but not the correct housing requirement figure as no buffer has been applied. The NPPF 2024 requires the application of a buffer of a minimum 5%. Given the context in Castle Point of a poor housing delivery record, and given the identified supply for the new Plan is wholly from the Urban Area, this buffer should really be at least 10%. A robust and appropriate buffer is important to allow for a sufficient supply of sites that factors in potential under-delivery of the allocated capacity, or the slow delivery of allocated sites. This in turn ensures there is no risk of not being able to meet the minimum local housing need. 2.3. Notwithstanding the above, the Policy SP3 seeks to deliver		Yes	Not Answered	Yes	A	Doesn't meet Standard Method Housing number or correctly apply buffer. The Council's evidence does not support the growth strategy set out in SP3 of providing for only half of the housing growth required by the Standard Method. Approach to Green Belt conflicts with NPPF para 146 and the Council's own Green Belt Assessment (July 2025), Disagrees with rejection of GB5 suggestin	<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 section b (a) and (ii) give an acknowledgement of circumstances in which national policy does not expect Standard Method outcomes to be met in full. The Sustainability Appraisal (July 2025)	N

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											only 6,196 homes over the 17 year plan period, or 364 dwellings per annum. The new Plan provides various reasons for being unable to meet local housing need in full. The first is that it would “destroy large tracks [sic] of Green Belt, including land which strongly contributes to the Green Belt purposes”. 2.4. This reason conflicts with NPPF paragraph 146. The exceptional circumstances for releasing Green Belt land have been established, with the Council affirming that the Urban Area is insufficient to accommodate local housing needs in full. Paragraph 146 confirms that, where exceptional circumstances are established, Green Belt land should be released “unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt.” 2.5. This reason also ignores the Council’s own Green Belt Assessment (July 2025), which identifies areas of Green Belt that do not strongly contribute to the Green Belt purposes. Taking Land West of Benfleet (GB5) as an example, the Green Belt Assessment confirms that the overall performance of this parcel against the Green Belt purposes is “Moderate”, and that if the parcel were to be released, “that it would be unlikely to significantly harm the performance of the wider Green						g flawed criteria. The Transport Assessment process for potential Green Belt allocations has not been undertaken in a robust, appropriate and sound manner. This casts considerable doubt on the Council stating transport impacts as a reason for not releasing any Green Belt land at all for development. The Housing Topic Paper refers to the “Essex Parking Guidance Connectiv	provides the evidence of the negative impacts arising from an increase in the housing requirement. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Duty to Cooperate</u> Duty to Cooperate: 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).	

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											Belt owing to its limited size relative to the wider Green Belt and its position to the very west of the plan area”. This is just one example, but clearly show that the Council has not taken a sound approach in determining that there should be no release of Green Belt despite the existence of exceptional circumstances. 2.6. Another reason that is given is “protecting and enhancing the natural environment set out in policy SP1”. However, this has not been assessed through the Habitat Regulations Assessment and no evidence is provided that the release of Green Belt would lead to greater impacts than the current strategy. A straightforward presumption cannot be made that a greenfield site will have a higher biodiversity value than a brownfield site. A greenfield site in agricultural use can have a very low biodiversity baseline, while a brownfield site could contain open mosaic habitat which is high value, irreplaceable habitat. 2.7. Additionally, Policy SP1 conflates Green Belt with Green Infrastructure. Green Belt is an urban containment policy. It is not an environmental protection on the same level as Local Wildlife Sites, Ancient Woodland, or designated public open space (which are referred to in SP1 alongside Green Belt). This is demonstrated in the Housing Capacity Topic Paper (August 2025) which														ity Map” as an indicator for the sustainable connectivity of a site. This is quite evidently not the purpose of the mapping produced by Essex County Council, which is for the purpose of guiding parking standards . The mapping reflects the current situation, rather than accounting for the opportunities available for site permeability and connectivity which would increase accessibility of the		

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											demonstrates that GB5 is not constrained by any environmental designations (footnote 7 constraints), and is not identified as an area of particular importance for biodiversity in the LNRS. The Topic Paper does indicate that GB5 includes Open Space. However, this is only because the Council has expanded the GB5 boundaries to include the adjoining Arthur Stevens’ playing fields and Romsey Road Allotments. Persimmon is not promoting these parcels of land for development, and requests they be removed from the GB5 site boundary for all assessment and other purposes – in line with the site boundaries shown on the “Potentially Unconstrained Green Belt Map”. 2.8. Another reason given is “potential impact to heritage assets”. The evidence base contains no Borough-wide Heritage Assessments, only two site-specific assessments. Again therefore, no evidence is provided to support this reasoning. 2.9. Having confirmed that there are parcels of Green Belt land within the Borough that are not constrained by environmental, ecological or open space designations. Highway impacts and sustainable access are given as a further reason for not releasing Green Belt land development. The Council has undertaken a Green Belt Sites Assessment (July 2025) which has conducted site-specific							site to services and facilities. The use of this mapping in this manner by the Council is therefore not appropriate or robust. Notwithstanding this, the mapping shows that the site has areas of connectivity that ranges from High to Low. The new Plan suggests that the local plan evidence base demonstrates that the release of Green Belt land to meet local housing need in full is not		

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											assessments of all promoted Green Belt sites. The Assessment makes conclusions on the sustainability of each site. However, the results that have been reached are questionable. Again, the assessment for GB5 is used as an example to highlight Persimmon’s concerns for the wider assessment process. 2.10. First is the development quantum of GB5. The site boundary has been drawn to include playing fields and allotments located on the north-western boundary. Persimmon has no intention to include existing open space within the development boundary. No regard appears to have been had of existing development within the site, some of which is to be retained. The application of a gross density of 40 dwellings per hectare is also not accurate, as it does not account for the delivery of policy requirements such as open space, non-residential development etc. within the site. A development quantum of 1,308 dwellings is quoted; the above demonstrates that this is highly inaccurate and unrealistic. Based on the site that is actually promoted by Persimmon, a quantum of up to 850 dwellings is more realistic for the purpose of undertaking assessment work. 2.11. This use of a wrong development quantum means the trip generation modelling and development impacts is inaccurate and cannot be relied													feasible. This is disputed Argues that the Infrastructure Delivery Plan confirms that infrastructure needs arising from a higher level of housing growth can be met. The Housing Topic Paper seeks to make the argument that allocating Green Belt (greenfield) sites to increase the housing requirement would reduce the attractiveness of regeneration opportunities on brownfield		

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											upon. This needs to be reviewed and updated by the Council. 2.12. Notwithstanding this critical error, the Assessment goes on to conclude that there is limited potential for modal shift to sustainable transport. Persimmon disagrees with this assessment. The site is within easy walking distance (between 5 and 15 minutes) of several existing education, health and leisure facilities and bus stops, with the Tarpots Town Centre being at most a 20 minute walk from the site. There are already food connections to the existing footway network with opportunities existing for further enhancements to be made, particularly on Jotmans Lane. The same is applicable to cycle accessibility, with opportunities available to connect to existing and planned strategic cycle routes which would provide another transport mode to local facilities, including crucially Benfleet Train Station. 2.13. Lastly, the Council's Assessment concludes that bus access would be poor. Which seems to be based on a conclusion that direct access on to the A130 Canvey Way is not feasible. Even if that was the case, the size of the development proposed would justify the diversion of existing bus services into the site, or the introduction of a new bus service to serve new residents. One potential diversion could be via Wavertree Road and Jotmans Lane, which would not require						d sites in the urban area. However, the developers interested in developing each type will be different. Market Capacity: There is no evidence that there is a risk of "overallocation" of housing in a constrained market area. Ultimately, developers would not be promoting sites for development if there was no market demand for the homes, and they would certainly not take on the		

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											an access onto Canvey Way. This would though be a positive measure that would encourage residents to travel by bus; making the service more attractive by bringing the route into the site itself. 2.14. The above demonstrates that the Transport Assessment process for potential Green Belt allocations has not been undertaken in a robust, appropriate and sound manner. This casts considerable doubt on the Council stating transport impacts as a reason for not releasing any Green Belt land at all for development. 2.15. The Housing Topic Paper refers to the “Essex Parking Guidance Connectivity Map” as an indicator for the sustainable connectivity of a site. This is quite evidently not the purpose of the mapping produced by Essex County Council, which is for the purpose of guiding parking standards. The mapping reflects the current situation, rather than accounting for the opportunities available for site permeability and connectivity which would increase accessibility of the site to services and facilities. The use of this mapping in this manner by the Council is therefore not appropriate or robust. Notwithstanding this, the mapping shows that the site has areas of connectivity that ranges from High to Low. 2.16. The new Plan suggests that the local plan evidence base						significant costs associated with preparing planning applications. Five Year Supply: Suggests that at the point of adoption (if this version of the Plan were to ever reach adoption), the Council would not be able to demonstrate a five year housing supply. This is not in compliance with the NPPF or the NPPG. Suggest a lack of a housing trajectory Windfalls: SP3 identifies a windfall allowance		

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											demonstrates that the release of Green Belt land to meet local housing need in full is not feasible. However, the above has demonstrated that this is not the case. This is also agreed in the Council's own Housing Capacity Topic Paper – in section 13, the Paper confirms that while much of the Borough's Green Belt is subject to constraints, there are 17 Green Belt sites which are unconstrained and therefore suitable for consideration for development. This list includes GB5, GB2 and GB12, all of which are also identified through the Green Belt Assessment (July 2025) as potential Grey Belt. The sites therefore meet the sequential approach required by paragraph 148 – the exceptional circumstances for Green Belt development has been established, and there are Grey Belt sites available which can be prioritised for development ahead of the remainder of the Green Belt. 2.17. The Housing Topic Paper clearly agrees, confirming that the three sites (among others) can be taken forward for further consideration, albeit with a reduced area for GB2 to address heritage constraints. Despite this clear assessment of there being no overarching constraints, the Housing Topic Paper makes no conclusion that there is the ability to provide additional homes on housing delivery. The Paper concludes with a discussion of other considerations, but these are							of 45 dwellings per annum. The Housing Topic Paper clarifies this is based on an average of the homes delivered on sites of less than five dwellings over the period 2013 to 2025. However, this does not take into account the difficulties that are currently being faced by the small and medium housebuilders who deliver this level of housing. Looking instead at the period		

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											not presented as being sufficient evidence that development on Green Belt land is not feasible. These other considerations include: • Infrastructure: The Infrastructure Delivery Plan confirms that infrastructure needs arising from a higher level of housing growth can be met. The Housing Topic Paper suggests the need arising for a new primary school may be a constraint if a higher housing requirement is imposed, however the Council will be well aware that GB5 has been promoted with the ability to deliver non-residential uses, which could take the form of a primary school. This is therefore not a robust argument against increasing the housing requirement. • Regeneration: The Housing Topic Paper seeks to make the argument that allocating Green Belt (greenfield) sites to increase the housing requirement would reduce the attractiveness of regeneration opportunities on brownfield sites in the urban area. However, this misses the point that these are two very different forms of sites and the developers interested in developing each type will be different. It is also not the case that greenfield sites are automatically easier to develop with less infrastructure requirements compared to brownfield sites. The development management policies in the new Plan						between 2020 to 2025, the average delivery on small sites has been only 36 dwellings per year. Indeed, in 2023/24 only 26 dwellings were delivered, and this fell further still to 15 dwellings in 2024/25. The Housing Topic Paper also refers to the work undertaken for the SLAA a supporting a windfall allowance of 45 dwellings per annum. However, only a cursory look at the "Potential Windfall		

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											demonstrate well the increased requirements that are placed on greenfield sites, such as open space, affordable housing and sustainable transport provision. In addition, a strategic Green Belt site such as GB5 will have its own associated infrastructure requirements – to be delivered at considerable cost. • Market Capacity: As with the above, there is no evidence that there is a risk of “overallocation” of housing in a constrained market area. Ultimately, developers would not be promoting sites for development if there was no market demand for the homes, and they would certainly not take on the significant costs associated with preparing planning applications. 2.18. The Housing Topic Paper makes no strong argument that the above considerations carry sufficiently weight to disregard all Green Belt sites entirely. 2.19. The Council could point to the Sustainability Appraisal (July 2025) as providing the evidence of the negative impacts arising from an increase in the housing requirement. However, the Housing Topic Paper makes no reference to these impacts, so there is a disconnect between the two documents, calling into question the soundness of the evidence base. 2.20. Even if it were accepted that there could be some negative impacts arising from the release of Green Belt land.							Sites Missue with this approach. Two of these potential sites are located on London Road. The first, at 32 London Road, is a parking area to the rear of a block of affordable homes – with the car park clearly labelled “for residents” . The second site is further to the east, at 80 London Road, and is again a parking court for residents. Thirdly, Policy B9 – South Benfleet Playing Fields seeks to masterpla		

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											The negative impacts of not releasing Green Belt, and so not meeting housing needs in full, also need to be considered. Again, the answer is in the Council's own evidence base, specifically the Equality Impact Assessment (July 2025). This clearly sets out the negative impacts that would be had on the economic and housing prospects for young people, the negative impacts on community infrastructure requirements, particularly for the Jewish Community, the negative impacts on those looking for affordable homes, for starter homes, for accessible homes, or just homes in general. These homes cannot be sufficiently provided through the Council's current spatial strategy. The Equality Impact Assessment conclusion is clear: "Ensure that the housing needs of the borough is met and have awareness of how the provision of housing can impact those with [protected] characteristics". 2.21. The Council has provided no evidence that these negative impacts associated with the current spatial strategy of not providing for local housing needs in full have been considered in the balance against potential negative impacts associated with Green Belt release. The above discussion has shown that there are deficiencies in the robustness of the Council's assessment process for Green Belt sites, with GB5 used as just						n as a multi-functional green space. The above examples demonstrate that even the Council's reduced housing target is unlikely to be achieved. This is to be expected when a strategy relies solely on brownfield sites. For an effective housing strategy, a range of sites – small, strategic, greenfield, brownfield – need to be identified. In summary, there is limited technical		

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											one example. The Council's own evidence shows that there are unconstrained Green Belt sites, like GB5, that could be released for development without leading to significant impact on the purposes of the wider Green Belt, or other impacts. This aligns with the conclusions of previous development plans prepared by this same Council, which have allocated GB5 and other Green Belt sites for development (and those allocations have been supported by the Examining Inspector). 2.22. In conclusion, Persimmon Homes highlights that the Council's evidence does not support the growth strategy set out in SP3 of providing for only half of the housing growth required by the Standard Method. There are clearly opportunities available to increase the housing requirement, and to achieve a sound Local Plan the Council must demonstrate that it has explored all opportunities to maximise growth in seeking to achieve local housing need (which itself is the minimum housing requirement that a development plan should be aiming for). Persimmon Homes strongly recommends that the Council do not submit the new Plan for Examination until it has been reviewed in line with the above, updated and subject to a further consultation. It is considered that the current form of the new Plan is very unlikely to be found sound due to the						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 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. The new		

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											deficiencies in SP3. The Supply 2.23. Notwithstanding the above discussion on the robustness of the current proposed housing requirement. It is acknowledged that the level of delivery proposed in the Castle Point Plan Regulation 19 Draft would be an increase in supply over current (poor) levels of delivery. However, this is a stepped housing delivery. SP3(4) indicates that even this reduced housing requirement will only be met on an annual basis in the final seven years of the Plan period, with only 209 homes per annum allocated for delivery in the first five years, and 253 homes per annum in years 6-10. Meaning at the point of adoption (if this version of the Plan were to ever reach adoption), the Council would not be able to demonstrate a five year housing supply. This is not in compliance with the NPPF or the NPPG. 2.24. No detailed trajectory has been provided (for both new allocations and existing commitments) to demonstrate the above. This should have been made available now given this is a Regulation 19 Pre-Submission Plan to allow for interrogation. This is necessary for a sound and robust housing supply figure. 2.25. Paragraph 6.51 states that the stepped housing trajectory reflects the certainty the Council has in the delivery of						Plan is not positively prepared, not justified, and not compliant with national policy. There has also been no consideration of the legal requirement of opportunities for unmet need to be accommodated through the Duty to Co-operate. It therefore fails on all the soundness tests.		

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											sites, with sites that are less certain being pushed to later in the Plan period. The evidence behind this reasoning must be shared, as any site where there is a reasonable level of uncertainty around deliverability should not be included in the new Plan as a potential allocation at all. 2.26. Indeed, there are questions around the deliverability of the allocations that have been identified by the Council. Persimmon Homes highlights a couple of examples below, but it is for the Council to ensure that robust evidence is provided on the deliverability of all allocations – which includes a housing trajectory. 2.31. SP3 identifies a windfall allowance of 45 dwellings per annum. The Housing Topic Paper clarifies this is based on an average of the homes delivered on sites of less than five dwellings over the period 2013 to 2025. However, this does not take into account the difficulties that are currently being faced by the small and medium housebuilders who deliver this level of housing. Looking instead at the period between 2020 to 2025, the average delivery on small sites has been only 36 dwellings per year. Indeed, in 2023/24 only 26 dwellings were delivered, and this fell further still to 15 dwellings in 2024/25. 2.32. The Housing Topic Paper								

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											also refers to the work undertaken for the SLAA a supporting a windfall allowance of 45 dwellings per annum. However, only a cursory look at the “Potential Windfall Sites Maps” reveals the issue with this approach. Two of these potential sites are located on London Road. The first, at 32 London Road, is a parking area to the rear of a block of affordable homes – with the car park clearly labelled “for residents”. The second site is further to the east, at 80 London Road, and is again a parking court for residents. Thirdly, Policy B9 – South Benfleet Playing Fields seeks to masterplan as a multi-functional green space. 2.33. It must be emphasised this is based on only a cursory review of the mapping, but the issue is clear. 2.34. The above examples demonstrate that even the Council’s reduced housing target is unlikely to be achieved. This is to be expected when a strategy relies solely on brownfield sites. For an effective housing strategy, a range of sites – small, strategic, greenfield, brownfield – need to be identified. 2.36. In summary, there is limited technical justification for the dismissal of alternative spatial strategy options and previously considered Green Belt development sites that might have enabled the Borough								

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											to meet its 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. The new Plan is not positively prepared, not justified, and not compliant with national policy. There has also been no consideration of the legal requirement of opportunities for unmet need to be accommodate through the Duty to Co-operate. It therefore fails on all the soundness tests.								
0988 - 0002	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	HOU2	No		No	Positively prepared, Effective, Justified, Consistent with national policy	2.35 In addition, it is noted that Policy Hou2 only requires 10% affordable housing provision on urban sites (all affordable ownership), with a further 10% on urban sites (social rent) where no commercial development is provided. Given urban sites comprise the majority of the Council's identified supply, this would result in a maximum of 20% affordable provision arising from the current identified housing supply. Although the viability of this provision has not been		Yes	Not Answered	Yes	A	Objects to 10% affordable housing provision on urban sites with a further 10% on urban sites (social rent) where no commercial	This requirement is supported by the Castle Point Plan Viability Study.	N

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											justified, and is therefore questionable. Given the already poor affordable housing provision historically in Castle Point, which has led to an affordability crisis, there is no justification for further limiting opportunities for affordable housing provision.						development is provided. Questions the viability of this.		
0988 - 0003	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	HOU3	No		No	Positively prepared, Effective, Justified, Consistent with national policy	3.1. The qualification in Policy Hou3 that the stated mix is an initial benchmark is supported. Various site and other factors can determine the most appropriate housing mix for a site. It should also be recognised that the LHNA on which the benchmark housing mix is based is already two years old, and needs will continue to change and evolve over the Plan period. 3.2. The proposal to split the housing mix provision between “Premium Sustainability Areas” and “All Other Areas” is laudable, but ultimately disjointed in its reasoning. The assumption seems to be that the most sustainable and well connected sites are those located within the urban area, and so will be constrained in their ability to deliver larger homes at a higher quantum, while sites located outside of the urban area are the least sustainable. This is a broad generalisation that is not always true in practice. Take Land West of Benfleet (GB5) as an example, which is extremely well related to the urban area, with multiple opportunities for connections to existing streets and footpaths leading towards		Yes	Not Answered	Yes	A	The benchmark mix would be applied on a case-by-case basis should be included within the policy wording itself, to further emphasise the flexibility of the policy.	The council considers the supporting text to be sufficient	N

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											existing services, facilities (including Tarpots Town Centre) and public transport. 3.3. The supporting text reiterates that the benchmark mix would be applied on a case-by-case basis. Given the above inconsistencies in the reasoning behind the policy, it is recommended that this is drawn from the supporting text into the policy wording itself, to further emphasise the flexibility of the policy.								
0988 - 0004	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	HOU4	No		No	Positively prepared, Effective, Justified, Consistent with national policy	4.1. Persimmon seeks to build homes that can be comfortable and liveable for the long term. The provision of homes built to M4(2) and M4(3) standards is therefore supported. However, this is subject to policies being sound, which in this case means the Council providing evidence that there is a need for M4(2) / M4(3) provision, and demonstrating that this provision has been appropriately accounted for in the viability assessment. 4.2. In accordance with the NPPG, any policy requirement for homes to be built to either M4(2) or M4(3) standards will need to be supported and justified by robust evidence. The requirement for M4(3) in particular is not clear in its calculation. It is stated there is an existing need for 1,140 M4(3) homes in the Borough (of which some need will be met through the conversion of existing homes), which will rise by 400 units between 2023-2043. This represents 8% of the Council's		Yes	Not Answered	Yes	A	Objects to policy HOU4 as it lacks evidence for the M4(3) requirement.	Evidence for this requirement can be found in the Housing Needs Assessment 2023.	N

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											Local Housing Need figure of 5,100 homes. 4.3. The above has been translated into a benchmark figure of 8% of new homes to be built to M4(3) standard. The link between need and policy requirement has not been justified.								
0988 - 0005	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	D3	No		No	Positively prepared, Effective, Justified, Consistent with national policy	5.1. Clear criteria need to be provided of when the Council would expect a masterplan to be provided, the detail that a masterplan would need to cover, and the approval process for a masterplan. This will provide certainty to both applicants and decision makers, and ensure there is no unnecessary delay to the approval of planning applications – having regard to the resources available at the Council as well.		Yes	Not Answered	Yes	A	Clear criteria of the detail needed for the masterplan and the approval process is needed	Officers will work closely with developers to ensure that the masterplan is detailed. Policy D3 explains what is required.	N
0988 - 0006	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	GB1	No		No	Positively prepared, Effective, Justified, Consistent with national policy	6.1. Criterion 1 is currently not consistent with the NPPF. It is not the case, as implied by the current wording of the policy, that development on Green Belt land is only possible if allocated by a development plan. NPPF paragraphs 154 and 155 set out the exceptions where development is not regarded as being inappropriate in the Green Belt, and paragraph 153 establishes that inappropriate development can be approved where Very Special Circumstances exist.	6.2. Criterion 1 should be amended as follows: 6.3. Development proposals within the Green Belt, as defined on the Policies Map, will be assessed in accordance with the NPPF	Yes	Not Answered	Yes	A	Is of the view that it is not consistent with the NPPF	The Council has undertaken a Green Belt Review in accordance with the requirements of the Government's 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	N

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												ce with the relevant NPPF provisions . 6.4. The consistency of Policy GB2 (relating to previously developed land) with the NPPF also needs to be considered by the Council.						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. 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. 2018 Green Belt Assessments still form part of the evidence and considered wider areas.	

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0988 - 0007	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	ENV3	No		No	Positively prepared, Effective, Justified, Consistent with national policy	7.1. The requirement to deliver 20% Biodiversity Net Gain (BNG) on greenfield sites is not supported, as the policy currently allows for no flexibility for instances where this cannot be achieved – and no policy benefit for achieving this over-provision. The legislative requirement is for 10% BNG. The Council has provided no evidence of the benefit arising from a requirement in local policy that seeks more than the legislative minimum of 10%, nor has it considered the viability implications on sites. The Council should also bear in mind the effect that a higher BNG requirement would have on the number of homes sites are able to deliver, meaning additional allocations may be needed to deliver the target growth requirement. This also conflicts with provisions made elsewhere in the new Plan for sites to make an efficient use of available land and deliver as many homes as possible.		Yes	Not Answered	Yes	A	The requirement to deliver 20% Biodiversity Net Gain (BNG) on greenfield sites is not supported, as the policy currently allows for no flexibility for instances where this cannot be achieved – and no policy benefit for achieving this over-provision. The legislative requirement is for 10% BNG. The Council has provided no evidence of the benefit arising from a requirement in local	As set out in paragraph 18.29 'Local areas can set a higher requirement through their plans where it can be demonstrated it would be deliverable. Viability testing has indicated it is possible to secure 20% biodiversity net gain on greenfield sites, and this requirement has been set for those sites to improve local contribution to the local Nature Recovery network identified through the Local Nature Recovery Strategy for Essex'.	N

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																	policy that seeks more than the legislative minimum of 10%, nor has it considered the viability implications on sites. The Council should also bear in mind the effect that a higher BNG requirement would have on the number of homes sites are able to deliver, meaning additional allocations may be needed to deliver the target growth requirement. This also conflicts with provisions made elsewhere		

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																	in the new Plan for sites to make an efficient use of available land and deliver as many homes as possible.		
0988 - 0008	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	SD4	No		No	Positively prepared, Effective, Justified, Consistent with national policy	8.1. Persimmon Homes considers that a policy seeking to go beyond the sustainability standards set out in Building Regulations would not be effective. Building Regulations provide a national set of standards that allows housebuilders to plan with certainty, and ensures a national route towards building sustainable and energy efficient homes. 8.2. Regard should be had of the Housing Minister's Written Ministerial Statement in January 2023 which set out that the Government does 'not expect plan makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations'. The importance of the WMS was confirmed by a recent High Court judgement, which emphasised that new local plan policies must be reasonable and need to be drafted with due regard to the potential for impact on the deliverability and viability of new housing. The Council should therefore reconsider the inclusion of any		Yes	Not Answered	Yes	A	a policy seeking to go beyond the sustainability standards set out in Building Regulations would not be effective. Regard should be had of the Housing Minister's Written Ministerial Statement in January 2023 which set out that the Government does 'not expect plan makers to set local	The council has written SD4 based on robust evidence	N

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											policy requiring 'net zero' homes.						energy efficiency standards for buildings that go beyond current or planned building regulations'. The importance of the WMS was confirmed by a recent High Court judgement, which emphasised that new local plan policies must be reasonable and need to be drafted with due regard to the potential for impact on the deliverability and viability of new housing. The Council should therefore		

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																	reconsider the inclusion of any policy requiring 'net zero' homes.		
0988 - 0009	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	SD5	No		No	Positively prepared, Effective, Justified, Consistent with national policy	8.1. Persimmon Homes considers that a policy seeking to go beyond the sustainability standards set out in Building Regulations would not be effective. Building Regulations provide a national set of standards that allows housebuilders to plan with certainty, and ensures a national route towards building sustainable and energy efficient homes. 8.2. Regard should be had of the Housing Minister's Written Ministerial Statement in January 2023 which set out that the Government does 'not expect plan makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations'. The importance of the WMS was confirmed by a recent High Court judgement, which emphasised that new local plan policies must be reasonable and need to be drafted with due regard to the potential for impact on the deliverability and viability of new housing. The Council should therefore reconsider the inclusion of any policy requiring 'net zero' homes.		Yes	Not Answered	Yes	A	Persimmon Homes considers that a policy seeking to go beyond the sustainability standards set out in Building Regulations would not be effective. Building Regulations provide a national set of standards that allows housebuilders to plan with certainty, and ensures a national route towards building sustainable and energy efficient	Noted	N

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																	homes. Regard should be had of the Housing Minister's Written Ministerial Statement in January 2023 which set out that the Government does 'not expect plan makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations'. The importance of the WMS was confirmed by a recent High Court judgement, which emphasised that new local		

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																	plan policies must be reasonable and need to be drafted with due regard to the potential for impact on the deliverability and viability of new housing. The Council should therefore reconsider the inclusion of any policy requiring 'net zero' homes.		

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0988 - 0010	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	Foreword	No		No	Positively prepared, Effective, Justified, Consistent with national policy	1.1. These representations to the Castle Point Plan (“the new Plan”) consultation are made by Pegasus Group on behalf of Persimmon Homes Ltd. Persimmon Homes has various interests in Castle Point which are promoted for residential-led development: • Land West of Benfleet (GB5) • Land East of Canvey Road, Canvey Island (GB2) • Land at The Chase, Thundersley (GB12) 1.2. As these representations will highlight, national policy is very clear on the approach that should be taken to plan positively to maximise the available opportunities to meet local housing need. The new Plan that is presented by the Council simply does not provide sufficient justification or evidence for a departure from national policy. Persimmon Homes therefore has significant concerns about the ability for the new Plan to be found sound, if it was to be submitted for Examination in its current form. The deficiencies are throughout the new Plan and its supporting evidence base, from the housing requirement that has been calculated, to the spatial strategy that have been set out, to the housing supply that has been assumed (see Q45). Persimmon Homes also has concerns about the soundness of several development management policies, as also set out in these representations. 1.3. An up-to-date Local Plan is		Yes	Not Answered	Yes	A	National policy is very clear on the approach that should be taken to plan positively to maximise the available opportunities to meet local housing need. The new Plan that is presented by the Council simply does not provide sufficient justification or evidence for a departure from national policy. Persimmon Homes therefore has significant concerns about the ability for the new Plan to be	Comments noted and response provided to specific policy comments	N

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											critical for effective plan making. The current development plan was adopted in 1998, and had a plan period that ended in 2001 with the intention being for an early review to take place. Indeed, the current development plan was out-of-date at the point of adoption, given the first consultation took place in 1991 and it began the Examination process in 1994. 1.4. The lack of an effective and up-to-date local plan has had clear impacts on the Borough. The Council has consistently failed to demonstrate a five year supply of housing, with one of the worst housing supply positions in the country. The Council has also consistently failed the Housing Delivery Test since it was introduced in 2019. These are not just numbers; this failure has had, and continue to have, real impacts on real people. As quoted in the new Plan itself, the Borough has a housing register of 600 households, an affordability ration where house prices are 11 times above local wages, areas of high deprivation, and general low economic productivity. The Council's own Equality Impact Assessment (July 2025) for the new Plan highlights the significant negative impacts associated with a spatial strategy that does not provide for local housing needs. 1.5. The Council has a history of failing to prepare and adopt local plans. Several attempts over the previous 25 years have						found sound, if it was to be submitted for Examination in its current form. The deficiencies are throughout the new Plan and its supporting evidence base, from the housing requirement that has been calculated, to the spatial strategy that have been set out, to the housing supply that has been assumed (see Q45). Persimmon Homes also has concerns about the soundness of several development		

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											failed at examination, or been abandoned. The closest the Council got was in 2022 where a plan was found sound by the Planning Inspectorate – but which was subsequently withdrawn at the final stage prior to adoption. The sites promoted by Persimmon Homes were all allocated in this withdrawn Local Plan, and were found sound by the Inspector. 1.6. Given this history of failure in the development plan process, and the clear associated impacts, it would be logical to assume that the Council would make all efforts to prepare a sound and effective Local Plan. That is surely owed to the local community. The Council instead seems insistent on following an approach that will be found unsound and lead to yet another failed local plan – leading to additional cost for the local taxpayer, and further delay at securing an effective spatial plan for the Borough.							management policies, as also set out in these representations.			
0988 - 0011	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	C9	No		No	Positively prepared, Effective, Justified, Consistent with national policy	2.27. Allocation C9 Land at the Point, Canvey Island would see the re-development of employment land. The policy states that it would secure re-provision of employment at West Canvey. However, Allocation C4 West Canvey states it would secure a modest increase in commercial provision to support economic growth. The policy does not acknowledge or support the re-provision or relocation of existing employment that would be lost at C9.						Objecting to the loss of employment land at C9 Complicated site for delivery due to mixed use and would require a master developer	Policy C9 requires a masterplan in order to ensure comprehensive development is achieved. As detailed in the policy re-provision at west canvey of any lost employment land is required. Policy C4 at canvey allows for atleast a 10% increase in employment land provision which	N		

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											2.28. In addition, C9 would be a large and complicated site, with proposals to deliver both housing and employment on the same site – that already accommodates various uses. For effective delivery, a master developer would be required to ensure a clear vision is set from the outset, and then delivery in accordance with that vision is achieved. This does not seem to have been identified or considered by the Council.							would allow for this accomodation.	
0988 - 0012	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	Thun2	No		No	Positively prepared, Effective, Justified, Consistent with national policy	2.29. Policy Thun2 Kiln Road comprises a significant re-development of a brownfield site which is currently home to USP College. Again, a strong and effective masterplan would be required to ensure that the current education provision is not affected, and duly improved, through re-development to deliver housing on the same site.						Objecting to THUN2 due to it needing a masterplan and not being able to replace the education provision on site	Policy THUN2 requires a master plan to be produced with a phasing plan to ensure that the education provision on or off site has a timely delivery.	N
0988 - 0013	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	Thun3a	No		No	Positively prepared, Effective, Justified, Consistent with national policy	2.30. Policy Thun3A proposes replacement of Thundersley Clinic with housing. The new Plan and its evidence base continually highlights poor infrastructure capacity in Castle Point. The loss of this Clinic therefore needs to be justified.						The loss of this clinic needs to be justified	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
1101 - 0001	Duplicate representation received. See representation 1068-0001.																		
1102 - 0001	Duplicate representation received. See																		

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	representation 0817-0001.																		
1107 - 0001	Sue	Jackson				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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 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 has	N	

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																		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.	
1107 - 0002	Sue	Jackson				SP3			No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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.						The Castle Point is not consistent with national policy as it does not meet the standard methodology housing target. Considers that there is overdevelopment in urban areas particularly on Canvey Island and that Green Belt Sites should have been allocated for developm	The Castle Point Plan is underpinned by an evidence base including a Green Belt Assessment based on government guidelines and a housing topic paper which considered further criteria including impact on designated sites, transport and environmental impacts including flood risk. The evidence supported the regeneration and densification of urban sites	N

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																	ent instead.		
1107 - 0003	Sue	Jackson				C4					Canvey West homes put residents in the East at risk with emergency evacuation procedures.						Development at Canvey west impacts emergency evacuation procedures for residents at Canvey East	Castle Points resident's safety is a priority to the Council and has been considered within the Castle Point Plan	N
1108 - 0001	Vickey	Stark ey				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt , Grey Belt, Brownfield site option for 7500 homes... Add the Greenbelt /Grey Belt site of Kings Park HO31...					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 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	N

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												Reduce the urban housing target to 3500 from 6200, with Canvey at 1050... Total housing target of 11,000.						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 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.	

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1108 - 0002	Vickey	Stark ey				SP3		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	No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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.						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	<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> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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								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. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would									selectiction 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.	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>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey 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	

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								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 evacuation . This highlights once again the need for a third road off of										circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	

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								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. In light of these issues, at our last committee meeting we voted to support the residents with their objections, and have collected 131 signatures in support of an alternative proposal and have completed a joint response form in order to represent our residents and their families.											

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								As Chair and representative of the Residents Association I would also like to participate at the oral examination and be invited to speak on their behalf. I enclose the signature sheets completed by the residents, together with the completed Joint Response form and should be grateful if you would kindly acknowledge receipt using the email address shown above.											
1108 - 0003	Vickey	Stark ey				C4					Canvey West homes put residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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																	y evacuation procedures for those residents living at East Canvey		
1109 - 0001	Robert	Martin				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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 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	N

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																		inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it 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.		
1109 - 0002	Robert	Martin				SP3		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	No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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							Objects to the level of development proposed at Canvey Island as it would impact on the access routes on and off the island, particularly during an emergency evacuation. Considers that residents with limited digital	The Castle Point Plan considers improved access to Canvey Island in Policy C5 to support the proposed development. The Public Consultation included drop in events on Canvey Island on 20th August, 22nd August, 18th September and 25th September, residents could provide their responses either during the event or via postal letter. The Council has considered its housing strategy carefully and what can realistically be achieved within its boundaries taking into account its	N

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								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			over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led.						access had limited access to the public consultation. Considers that the Castle Point Plan is not consistent with national policy as it delivers less houses than the standard methodology housing target. Considers that more Green Belt sites should have been allocated.	environmental and physical constraints. This has been based on evidence from the Green Belt Assessment, The Housing Topic Paper and the Strategic Land Availability Assessments. The evidence supported a lower housing delivery of 6,196 houses with a strategy of regeneration and urban densification.	

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								these matters and the committee are in agreement with them. 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											

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								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. In light of these issues, at our last committee meeting we voted to support the residents with their objections, and have											

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								collected 131 signatures in support of an alternative proposal and have completed a joint response form in order to represent our residents and their families. As Chair and representative of the Residents Association I would also like to participate at the oral examination and be invited to speak on their behalf. I enclose the signature sheets completed by the residents, together with the completed Joint Response											

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								form and should be grateful if you would kindly acknowledge receipt using the email address shown above.											
1109 - 0003	Robert	Martin				C4					Canvey West homes put 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
1110 - 0001	Andrew	Elliot				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes... Add the Greenbelt /Grey Belt site of					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	Thorney 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 commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper	N

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												Kings Park HO31... Reduce the urban housing target to 3500 from 6200, with Canvey at 1050... Total housing target of 11,000.						local residents (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 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.	

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1110 - 0002	Andrew	Elliot				SP3		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	No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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.						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	<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> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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								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. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would									selectiction 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.	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>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey 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	

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								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 evacuation. This highlights once again the need for a third road off of												circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	

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								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. In light of these issues, at our last committee meeting we voted to support the residents with their objections, and have collected 131 signatures in support of an alternative proposal and have completed a joint response form in order to represent our residents and their families.											

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								As Chair and representative of the Residents Association I would also like to participate at the oral examination and be invited to speak on their behalf. I enclose the signature sheets completed by the residents, together with the completed Joint Response form and should be grateful if you would kindly acknowledge receipt using the email address shown above.											
1110 - 0003	Andrew	Elliot				C4					Canvey West homes put residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1111 - 0001	Philip	Moran				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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 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	N

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1111 - 0002	Philip	Moran				SP3		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	No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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						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	<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 Design

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								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			over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led.						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	approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley Northwest</u> 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>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u>	

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								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. In light of these issues, at our last committee meeting we voted to support the residents with their objections, and have											

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1111 - 0003	Philip	Moran				C4					Canvey West homes put 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
1112 - 0001	Steven	Hutton				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500					The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further	Thorney 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 commitments. Full details of the 480	N

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																	y evacuation procedures for those residents living at East Canvey		
1113 - 0001	Maureen	Martin				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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 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	N

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1113 - 0002	Maureen	Martin				SP3		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	No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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							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	<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 Design

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								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			over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led.						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	approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley Northwest</u> 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>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u>	

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1113 - 0003	Maureen	Martin				C4					Canvey West homes put 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
1114 - 0001	Pauline	Jones				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500					The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further	Thorney 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 commitments. Full details of the 480	N

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1114 - 0003	Pauline	Jones				C4					Canvey West homes put residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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																	y evacuation procedures for those residents living at East Canvey		
1115 - 0001	Derek	Warren				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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 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	N

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1116 - 0002	Sharon	Moran				SP3		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	No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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.						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	<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> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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								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. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would									selectiction 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.	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>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey 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	

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								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 evacuation . This highlights once again the need for a third road off of										circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	

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								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. In light of these issues, at our last committee meeting we voted to support the residents with their objections, and have collected 131 signatures in support of an alternative proposal and have completed a joint response form in order to represent our residents and their families.											

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								As Chair and representative of the Residents Association I would also like to participate at the oral examination and be invited to speak on their behalf. I enclose the signature sheets completed by the residents, together with the completed Joint Response form and should be grateful if you would kindly acknowledge receipt using the email address shown above.											
1116 - 0003	Sharon	Moran				C4					Canvey West homes put residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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																	y evacuation procedures for those residents living at East Canvey		
1117 - 0001	Edward	Edwards				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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 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	N

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																		inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it 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.		
1117 - 0002	Edward	Edwards				SP3		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	No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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							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	<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 Design

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								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			over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led.						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	approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley Northwest</u> 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>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u>	

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1117 - 0003	Edward	Edwards				C4					Canvey West homes put 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
1118 - 0001	Robert	Jones				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500					The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further	Thorney 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 commitments. Full details of the 480	N

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								land supply.				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.					development which improves the site environment for local residents	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 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.	

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1118 - 0002	Robert	Jones				SP3		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	No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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.						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	<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> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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1119 - 0001	William	Shotton				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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 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	N

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1119 - 0002	William	Shotton				SP3		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	No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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						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	<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 Design

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								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			over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led.						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	approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley Northwest</u> 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>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u>	

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1119 - 0003	William	Shotton				C4					Canvey West homes put 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
1120 - 0001	Barbara	Harmer				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500					The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further	Thorney 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 commitments. Full details of the 480	N

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1120 - 0003	Barbara	Harmer				C4					Canvey West homes put residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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																	y evacuation procedures for those residents living at East Canvey		
1121 - 0001	Margaret	Brennan				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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 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	N

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1122 - 0001	Rosemary	Grimsey				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500					The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further	Thorney 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 commitments. Full details of the 480	N

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								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 evacuation . This highlights once again the need for a third road off of										circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	

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								As Chair and representative of the Residents Association I would also like to participate at the oral examination and be invited to speak on their behalf. I enclose the signature sheets completed by the residents, together with the completed Joint Response form and should be grateful if you would kindly acknowledge receipt using the email address shown above.											
1122 - 0003	Rosemary	Grimsey				C4					Canvey West homes put residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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																	y evacuation procedures for those residents living at East Canvey		
1123 - 0001	Ian	Grimsey				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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 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	N

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																		inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it 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.		
1123 - 0002	Ian	Grimsey				SP3		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	No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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							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	<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 Design

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								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			over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led.						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	approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley Northwest</u> 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>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u>	

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1123 - 0003	Ian	Grimsey				C4					Canvey West homes put 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
1124 - 0001	Joyce	Sanders				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500					The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further	Thorney 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 commitments. Full details of the 480	N

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								land supply.				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.					development which improves the site environment for local residents	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 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.	

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1124 - 0002	Joyce	Sanders				SP3		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	No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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.						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	<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> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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1125 - 0001	Graham	Sanders				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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 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	N

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1125 - 0002	Graham	Sanders				SP3		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	No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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						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	<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 Design

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1125 - 0003	Graham	Sanders				C4					Canvey West homes put 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
1126 - 0001	Brenda	Tanner				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500					The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further	Thorney 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 commitments. Full details of the 480	N

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1126 - 0002	Brenda	Tanner				SP3		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	No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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.						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	<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> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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1126 - 0003	Brenda	Tanner				C4					Canvey West homes put residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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																	y evacuation procedures for those residents living at East Canvey		
1127 - 0001	John	Tanner				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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 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	N

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1127 - 0002	John	Tanner				SP3		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	No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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						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	<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 Design

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1128 - 0001	Christine	Tuggey				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500					The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further	Thorney 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 commitments. Full details of the 480	N

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								As Chair and representative of the Residents Association I would also like to participate at the oral examination and be invited to speak on their behalf. I enclose the signature sheets completed by the residents, together with the completed Joint Response form and should be grateful if you would kindly acknowledge receipt using the email address shown above.											
1128 - 0003	Christine	Tuggey				C4					Canvey West homes put residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

ID Ref	Individual/Organisation/Age nt?	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
																	y evacuation procedures for those residents living at East Canvey		
1307 - 0001	ERROR																		
1411 - 0001	ERROR																		
1416 - 0001	ERROR																		
1447 - 0001	Second Response - Please see Rep 1440																		
Intentionally Left Blank																			