



Castle Point Together
Your community your views



**Regulation 19 Consultation Spreadsheet
Representations and Responses to the SA - SEA**

Ordered by Surname Alphabetically

January 2026



ID	Individual/ Organisation/ Agent?	Last Name	First Name	If organisation - name	Email Address	Has agreed to publication of Name/Comments?	Future Notifications requested?	Comment	Summary	CPBC Officer Response
SA/SEA - 005 - 001				Ceres Property for Privo Land Ltd				<p>3.1 The preparation of the new Castle Point Local Plan must comply with the Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No.1633) ('the SEA Regulations'), which transposes the plan-making elements of European Directive 2001/42/EC ('the SEA Directive') into UK law.</p> <p>3.2 The SEA Regulations require that an Environmental Report is prepared. In this case, the Council appears to be seeking to discharge its obligation through the 'Strategic Environmental Assessment (SEA) and Sustainability Appraisal Accompanying the Regulation 19 Submission Version of the Castle Point Plan July 2025' ('the SA')</p> <p>3.3 The SA is required to identify, describe, and evaluate the likely significant effects on the environment of proposed options, as well as on reasonable alternatives (Regulation 12(2) of the SEA Regulations). Regulation 12(3) further sets out the information required to be included within the SA, referencing Schedule 2 of the SEA Regulations. Schedule 2 states that SA/SEA should consider short, medium and long term effects; permanent and temporary effects; positive and negative effects; and secondary, cumulative and synergistic effects.</p>	<p>The SA and SP3 Evolving National Guidance 3.9 It is understood that the SA Scoping Report predates the publication of the 2024 National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guidance (PPG), which clarify how Local Planning Authorities must calculate local housing need and emphasise that such figures represent the minimum number of homes to be planned for. It is unclear why the reasonable alternatives assessed in the SA have not been updated to reflect these national policy requirements. For the Draft Local Plan (DLP) to be found sound, it must, among other things, be consistent with national policy. Accordingly, the assessment of reasonable alternatives should have been revised to ensure it reflects the actual options available within the context of a Local Plan that is required to meet housing needs in full.</p> <p>Affordable Housing 3.10 Worryingly, there is a lack of acknowledgement of the severity of the Borough's affordable housing shortage, or the issue regarding the affordability of housing in the area in respect of the SA's appraisal of Policy SP3 is the.</p> <p>3.11 The Castle Point Local Housing Needs Assessment Update (2025) ('the LHNA Update') estimates there are currently 3,220 households</p>	<p><u>Evolving National Guidance</u> The assessment of options for Policy SP3 is clear that option 3 stems directly from the December 2024 NPP, clearly updating since the scoping report in line with national policy requirements..</p> <p><u>Affordable Housing</u> The assessment of options for Policy SP3 notes under objective 14 that '<i>The Local Housing Needs Assessment 2023 identified an Objectively Assessed Need (OAN) of 255 per annum for Castle Point, 197 of which are derived from the 10-year migration trend.</i>' <i>It then assesses the four options likelihood of meeting this figure..</i></p> <p><u>Objective 1 Biodiversity.</u> The ecological value of options has clearly been set out throughout the report.</p> <p><u>Objective 10</u> Areas served by existing public transport networks, as well as being hubs for multiple routes are considered to be inherently more sustainable.</p>

				<p>3.4 As confirmed through case law (see Heard1), whilst it is not necessary to keep open all options for the same level of detailed examination at all stages, at each stage the preferred option and reasonable alternatives must be assessed to the same level of detail. This includes considering alternatives for any modifications to a plan, even if late in the plan-making process.</p> <p>3.5 To comply with the SEA Regulations, it is essential that the Sustainability Appraisal (SA) provides an accurate and balanced assessment of reasonable alternatives. This must be grounded in robust, objective, and factual evidence, rather than relying on assumptions or public opinion. This principle was affirmed in Stonegate Homes Ltd v Horsham District Council [2016] EWHC 2512 ('Stonegate').</p> <p>3.6 Separately, the NPPF makes clear that a sustainable appraisal that meets the relevant legal requirements should inform the preparation of a Local Plan throughout its process – the SA is relevant to the DLP's legal compliance, but also a DLP's soundness.</p> <p>1 Heard v Broadland District Council [2012] EWHC 344 (Admin)</p> <p>3.7 The SA explains that there were four options considered in respect of Policy SP3 (Meeting Development Needs).</p> <p>1. Preferred Policy: Limit new development on brownfield sites within the urban area. No Green Belt Allocations</p> <p>2a. Release a limited number of approximately 5</p>	<p>in the Borough living in unsuitable housing and are unable to afford their own housing; and projects a net need for a total of 3,976 affordable homes over the period 2026-2043. This equates to 234 affordable dwelling per annum (dpa).</p> <p>Objective 1 Biodiversity.</p> <p>3.13 Objective 1 concerns both the protection and enhancement of biodiversity. The SA considers, in short, that the greater housing growth options, the more negative the impact in relation to this objective. The accompanying commentary in relation to Policy SP3 and this objective seems to be based on the view that higher growth options would inevitably entail development of areas that of ecological value. However, the evidence as to how much housing development could be delivered without loss of ecologically valuable areas is unclear.</p> <p>3.14 Development is required to be accompanied by biodiversity net gain (BNG). In crude terms, the more development the more BNG would be delivered. The SA appears dismissive of this, stating that "habitats and species may take decades or more to become established and reach a stage of ecological maturity (500 years in the case of ancient woodland)." However, there is nothing to suggest that higher growth options would necessitate loss of Ancient Woodland or that only Ancient Woodland would provide the necessary BNG. This overarching attitude appears to tarnish high growth options, without</p>
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				<p>Green/Grey Belt sites</p> <p>2b. Release a larger number of approximately 10 larger Green Belt sites</p> <p>3. National Standard Method target which equates to 701 (686 March 2025 updated figure) per annum) over the plan period (11,662 over period 2026-2043)</p> <p>3.8 It is explained at paragraph 4.2.2 of the SA that these four options derived from the SA Scoping Report.</p> <p>3.9 It is understood that the SA Scoping Report predates the publication of the 2024 National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guidance (PPG), which clarify how Local Planning Authorities must calculate local housing need and emphasise that such figures represent the minimum number of homes to be planned for. It is unclear why the reasonable alternatives assessed in the SA have not been updated to reflect these national policy requirements. For the Draft Local Plan (DLP) to be found sound, it must, among other things, be consistent with national policy. Accordingly, the assessment of reasonable alternatives should have been revised to ensure it reflects the actual options available within the context of a Local Plan that is required to meet housing needs in full.</p> <p>3.10 Worryingly, there is a lack of acknowledgement of the severity of the Borough's affordable housing shortage, or the issue regarding the affordability of housing in the area in respect of the SA's appraisal of Policy SP3 is the.</p>	<p>understanding the reality and deliverability of higher growth options.</p> <p>Objective 10</p> <p>3.15 Objective 10 concerns reduction of the need to travel by private car and promotion of sustainable forms of transport. Option 1 is the only one that is appraised as not having a negative impact on this objective; with Option 2a assessed as 'minor negative' and Options 2b and 3 as 'significant negative'.</p> <p>3.16 In seeking to justify this, the commentary states that "Green Belt development would exacerbate the car-dependency issue as these would be less well serve by bus services and more remote from existing services. Development focused on existing centres may help facilitate this objective, by locating residents close by existing services and existing sustainable transport options". However, this presupposes that Green Belt sites are inherently remote and impossible to be served by public transport. However, this is not the case. The Green Belt boundary is drawn tightly around existing built-up areas of the Borough's settlements, and thus includes land that is in proximity to facilities and services, and capable of being served by public transport. It also fails to consider that the low growth option (Option 1) has the potential to increase the need for travel by private car, for example forcing members of the community and employees of local</p>
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				<p>3.11 The Castle Point Local Housing Needs Assessment Update (2025) ('the LHNA Update') estimates there are currently 3,220 households in the Borough living in unsuitable housing and are unable to afford their own housing; and projects a net need for a total of 3,976 affordable homes over the period 2026-2043. This equates to 234 affordable dwelling per annum (dpa).</p> <p>3.12 In addition, there are clear inadequacies in the way the Sustainability Appraisal (SA) has assessed the options for Policy SP3, particularly in relation to several specific SA objectives.</p> <p>3.13 Objective 1 concerns both the protection and enhancement of biodiversity. The SA considers, in short, that the greater housing growth options, the more negative the impact in relation to this objective. The accompanying commentary in relation to Policy SP3 and this objective seems to be based on the view that higher growth options would inevitably entail development of areas that of ecological value. However, the evidence as to how much housing development could be delivered without loss of ecologically valuable areas is unclear.</p> <p>3.14 Development is required to be accompanied by biodiversity net gain (BNG). In crude terms, the more development the more BNG would be delivered. The SA appears dismissive of this, stating that "habitats and species may take decades or more to become established and reach a stage of ecological maturity</p>	<p>businesses to meet their accommodation needs outside of the Borough, increasing the need to commute by car.</p>
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(500 years in the case of ancient woodland).” However, there is nothing to suggest that higher growth options would necessitate loss of Ancient Woodland or that only Ancient Woodland would provide the necessary BNG. This overarching attitude appears to tarnish high growth options, without understanding the reality and deliverability of higher growth options.

3.15 Objective 10 concerns reduction of the need to travel by private car and promotion of sustainable forms of transport. Option 1 is the only one that is appraised as not having a negative impact on this objective; with Option 2a assessed as ‘minor negative’ and Options 2b and 3 as ‘significant negative’.

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						being served by public transport. It also fails to consider that the low growth option (Option 1) has the potential to increase the need for travel by private car, for example forcing members of the community and employees of local businesses to meet their accommodation needs outside of the Borough, increasing the need to commute by car.		
SA/SEA - 005 - 002			Ceres Property for Privo Land Ltd			<p>3.17 In respect of SA Objective 11 (“improve the quality, range, and accessibility to essential services, facilities, green infrastructure and open space”) Option 1 is assessed as having a ‘minor positive’ / ‘minor negative’ impact, whereas the other options in which more homes are provided, including through Green Belt development) are assessed as having a negative.</p> <p>3.18 For instance, the SA commentary appears to assume that any development within the Green Belt would inherently result in housing located far from accessible services. However, this is evidently inaccurate, as there are numerous Green Belt sites that are well-connected and in close proximity to a range of facilities and services.</p> <p>3.19 The SA commentary further states that “Development focused on existing centres may help facilitate this objective for most services.” However, this appears to rest on a flawed assumption that development within existing centres and on selected Green Belt sites are mutually exclusive options. In reality, both forms of development</p>	<p>Objective 11</p> <p>3.17 In respect of SA Objective 11 (“improve the quality, range, and accessibility to essential services, facilities, green infrastructure and open space”) Option 1 is assessed as having a ‘minor positive’ / ‘minor negative’ impact, whereas the other options in which more homes are provided, including through Green Belt development) are assessed as having a negative.</p> <p>3.18 For instance, the SA commentary appears to assume that any development within the Green Belt would inherently result in housing located far from accessible services. However, this is evidently inaccurate, as there are numerous Green Belt sites that are well-connected and in close proximity to a range of facilities and services.</p> <p>3.19 The SA commentary further states that “Development focused on existing centres may help facilitate this objective for most services.” However, this appears to rest on a flawed assumption that development within existing centres and on selected Green Belt sites are mutually exclusive options. In reality,</p>	Noted

				<p>could be pursued concurrently. Moreover, the commentary overlooks the limited capacity of existing centres to accommodate the scale of housing needed. 3.20 The commentary also states “there are pre-existing open space deficits that will be difficult to fully address, e.g. six wards in the Borough have no access to youth play space” and that “contributions to address this will be competing with a limited pot that also serves wider needs, e.g. health, education, affordable housing, etc”. This commentary only supports seeking to achieve the minimum housing requirement, rather than the much lower figure proposed by the DLP, in order to help facilitate provision of additional youth play space, and ensure greater contributions to additional public open space. It is important to recognise that much of the Borough’s Green Belt is not publicly accessible and currently has no recreational value. The SA commentary fails to acknowledge that development of Green Belt does not need to / nor would it predominantly entail the loss of public open space, but is, in fact, more likely to increase such provision. 3.21 The appraisal of the options against SA Objective 11 is fundamentally flawed.</p>	<p>both forms of development could be pursued concurrently. Moreover, the commentary overlooks the limited capacity of existing centres to accommodate the scale of housing needed. 3.20 The commentary also states “there are pre-existing open space deficits that will be difficult to fully address, e.g. six wards in the Borough have no access to youth play space” and that “contributions to address this will be competing with a limited pot that also serves wider needs, e.g. health, education, affordable housing, etc”. This commentary only supports seeking to achieve the minimum housing requirement, rather than the much lower figure proposed by the DLP, in order to help facilitate provision of additional youth play space, and ensure greater contributions to additional public open space. It is important to recognise that much of the Borough’s Green Belt is not publicly accessible and currently has no recreational value. The SA commentary fails to acknowledge that development of Green Belt does not need to / nor would it predominantly entail the loss of public open space, but is, in fact, more likely to increase such provision. 3.21 The appraisal of the options against SA Objective 11 is fundamentally flawed.</p>
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SA/SEA - 005 - 003	Ceres Property for Privo Land Ltd		<p>3.22 Turning to SA Objective 12, the approach to appraisal of the options is one of the most problematic elements of the SA. This SA objective is “To reduce poverty, deprivation and social exclusion”.</p> <p>3.23 The SA commentary notes “Development in centres most likely to contribute towards regeneration, enhance the realm and facilitate engagement and participation in community/cultural activities”; and also “new housing development may help some on to the housing ladder and help address social exclusion to some extent”.</p> <p>3.24 The SA appraisal assesses each option as having the same impact (‘minor positive’ / ‘possibility of either positive or negative impacts, or general uncertainty’). This is an obviously unfeasible position for the SA to adopt, for several reasons.</p> <p>3.25 The SA fails to properly recognise the importance of ensuring people have access to appropriate, affordable, housing. Below provides a summary of just some of the issues that are caused by a lack of sufficient accommodation, that we suggest should be considered in an update to the SA (the list is not exhaustive):</p> <ul style="list-style-type: none"> • Homelessness. As of 31 March 2024, the Government reported that 117,450 households were living in temporary accommodation—an increase of 12.3% from the previous year. Shelter estimates that 354,016 	<p>SA Objective 12</p> <p>The approach to appraisal of the options is one of the most problematic elements of the SA. This SA objective is “To reduce poverty, deprivation and social exclusion”.</p> <p>3.23 The SA commentary notes “Development in centres most likely to contribute towards regeneration, enhance the realm and facilitate engagement and participation in community/cultural activities”; and also “new housing development may help some on to the housing ladder and help address social exclusion to some extent”.</p> <p>3.24 The SA appraisal assesses each option as having the same impact (‘minor positive’ / ‘possibility of either positive or negative impacts, or general uncertainty’). This is an obviously unfeasible position for the SA to adopt, for several reasons.</p> <p>3.25 The SA fails to properly recognise the importance of ensuring people have access to appropriate, affordable, housing. Below provides a summary of just some of the issues that are caused by a lack of sufficient accommodation, that we suggest should be considered in an update to the SA (the list is not exhaustive):</p> <ul style="list-style-type: none"> • Homelessness. As of 31 March 2024, the Government reported that 117,450 households were living in temporary accommodation—an increase of 12.3% from the previous year. Shelter estimates that 354,016 	<p>The link between housing development and social exclusion is recognised, but it is not the only factor contributing to this objective.</p> <p>Whilst all options would see development/regeneration in centres, option 1 sees the greatest proportion of total development being located in centres, thereby maximising the relative social inclusion benefits.</p>
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				<p>accommodation and to address related health and social issues.</p> <ul style="list-style-type: none"> • Unaffordable housing. The persistent undersupply of homes has led to a sharp decline in affordability. The ratio of average house prices to average earnings has risen dramatically, making home ownership increasingly unattainable for many. • Education and development. Children living in unstable or substandard housing often face educational disadvantages, including disrupted schooling, poor study environments, fatigue, higher absence rates⁵. • Delayed independence and postponement of family planning. The unaffordability of housing has contributed to an increase in the average age at which people buy their first home – 34 as of 2022/236. • Economic impact. The lack of housing impairs labour mobility, which impacts on the formation of new businesses and the retention of existing ones due to resultant recruitment issues. <p>The 2 Commons Library Research Briefing: Households in temporary accommodation. Published Monday, 30 January 2023</p> <p>3 Heriot Watt University and Crisis (2023) The Homelessness Monitor: England 2023</p> <p>4 Crisis, Lloyds Banking Group and Simon Community Northern Ireland The 'A – Z' of issues caused by the social housing shortage. Published 17 September 2024</p> <p>5 Cebr (2024) The economic impact of building social housing: A Cebr report for Shelter and the National Housing Federation</p> <p>6 DLUHC Housing history and future housing. Published 14 December</p>	<p>homes has led to a sharp decline in affordability. The ratio of average house prices to average earnings has risen dramatically, making home ownership increasingly unattainable for many.</p> <ul style="list-style-type: none"> • Education and development. Children living in unstable or substandard housing often face educational disadvantages, including disrupted schooling, poor study environments, fatigue, higher absence rates⁵. • Delayed independence and postponement of family planning. The unaffordability of housing has contributed to an increase in the average age at which people buy their first home – 34 as of 2022/236. • Economic impact. The lack of housing impairs labour mobility, which impacts on the formation of new businesses and the retention of existing ones due to resultant recruitment issues. <p>The 2 Commons Library Research Briefing: Households in temporary accommodation. Published Monday, 30 January 2023</p> <p>3 Heriot Watt University and Crisis (2023) The Homelessness Monitor: England 2023</p> <p>4 Crisis, Lloyds Banking Group and Simon Community Northern Ireland The 'A – Z' of issues caused by the social housing shortage. Published 17 September 2024</p> <p>5 Cebr (2024) The economic impact of building social housing: A Cebr report for Shelter and the National Housing Federation</p> <p>6 DLUHC Housing history and future housing. Published 14 December</p>
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				<p>September 2024 5 Cebr (2024) The economic impact of building social housing: A Cebr report for Shelter and the National Housing Federation 6 DLUHC Housing history and future housing. Published 14 December 2023 increased cost of housing as a result of a lack of supply also has negative impacts in terms of people having less disposable income, limiting local economic activity and growth.</p> <ul style="list-style-type: none"> • Public services recruitment. Research produced by Centre for Cities noted that the NHS, police, and schools have all experienced difficulties in recruiting that have been linked to unaffordability of housing within certain areas. <p>3.26 The above list is not exhaustive and demonstrates just how critical the issue of providing sufficient housing is for social and economic objectives. These issues are very relevant to Castle Point Borough and the DLP, given the extent of affordable housing need in the Borough and the lack of an existing supply.</p> <p>3.27 It is alarming that, despite the evident acute shortage of housing (and affordable housing in particular) in the Borough, the potential consequences of this – and the benefits of this being addressed – have not been properly considered through the SA.</p> <p>3.28 For the SA to simply state that “new housing...may help some on the housing ladder and help address social exclusion to</p> <p>2023 increased cost of housing as a result of a lack of supply also has negative impacts in terms of people having less disposable income, limiting local economic activity and growth.</p> <ul style="list-style-type: none"> • Public services recruitment. Research produced by Centre for Cities noted that the NHS, police, and schools have all experienced difficulties in recruiting that have been linked to unaffordability of housing within certain areas. <p>3.26 The above list is not exhaustive and demonstrates just how critical the issue of providing sufficient housing is for social and economic objectives. These issues are very relevant to Castle Point Borough and the DLP, given the extent of affordable housing need in the Borough and the lack of an existing supply.</p> <p>3.27 It is alarming that, despite the evident acute shortage of housing (and affordable housing in particular) in the Borough, the potential consequences of this – and the benefits of this being addressed – have not been properly considered through the SA.</p> <p>3.28 For the SA to simply state that “new housing...may help some on the housing ladder and help address social exclusion to</p> <p>2023 increased cost of housing as a result of a lack of supply also has negative impacts in terms of people having less disposable income, limiting local economic activity and growth.</p> <ul style="list-style-type: none"> • Public services recruitment. Research produced by Centre for Cities noted that the NHS, police, and schools have all experienced difficulties in recruiting that have been linked to unaffordability of housing within certain areas. <p>3.26 The above list is not exhaustive and demonstrates just how critical the issue of providing sufficient housing is for social and economic objectives. These issues are very relevant to Castle Point Borough and the DLP, given the extent of affordable housing need in the Borough and the lack of an existing supply.</p> <p>3.27 It is alarming that, despite the evident acute shortage of housing (and affordable housing in particular) in the Borough, the potential consequences of this – and the benefits of this being addressed – have not been properly considered through the SA.</p> <p>3.28 For the SA to simply state that “new housing...may help some on the housing ladder and help address social exclusion to</p>
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				<p>some extent" (emphasis added), and then to appraise an option which would deliver vastly fewer homes (including affordable homes) as having the same impacts as options that would make a much greater contribution, is considered illogical, unjustified and non-compliant with SEA Regulations.</p> <p>3.29 This troubling approach worsens, as the SA appears to have no regard to the LHNA Update findings regarding the scale of affordable housing need (495 affordable dpa) compared to the number of affordable homes the Council's Housing Topic Paper 2025 suggests the DLP (i.e. Policy SP3 Option 1) will deliver – a mere 86 affordable dpa.</p> <p>3.30 The SA fails to properly consider the potential very significant negative social and economic effects of planning to allow such a scale of affordable housing need to go unmet.</p> <p>3.31 Even if the above issue were not sufficient to constitute a breach of the SEA Regulations, it would still represent a fundamental flaw in the Draft Local Plan's (DLP) soundness. This is due to the critical role the Sustainability Appraisal (SA) plays in justifying both the selection of preferred options and the rejection of reasonable alternatives.</p> <p>3.32 Separately, we consider that the Sustainability Appraisal (SA) has failed to properly assess the chronological aspects of the options in relation to this SA Objective. Specifically, the DLP not only proposes significantly fewer homes</p>	<p>unjustified and non-compliant with SEA Regulations.</p> <p>3.29 This troubling approach worsens, as the SA appears to have no regard to the LHNA Update findings regarding the scale of affordable housing need (495 affordable dpa) compared to the number of affordable homes the Council's Housing Topic Paper 2025 suggests the DLP (i.e. Policy SP3 Option 1) will deliver – a mere 86 affordable dpa.</p> <p>3.30 The SA fails to properly consider the potential very significant negative social and economic effects of planning to allow such a scale of affordable housing need to go unmet.</p> <p>3.31 Even if the above issue were not sufficient to constitute a breach of the SEA Regulations, it would still represent a fundamental flaw in the Draft Local Plan's (DLP) soundness. This is due to the critical role the Sustainability Appraisal (SA) plays in justifying both the selection of preferred options and the rejection of reasonable alternatives.</p> <p>3.32 Separately, we consider that the Sustainability Appraisal (SA) has failed to properly assess the chronological aspects of the options in relation to this SA Objective. Specifically, the DLP not only proposes significantly fewer homes</p> <p>3.33 The above criticisms</p>
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					<p>than are required, but also a stepped delivery programme. Effectively proposing delays their delivery until the later stages of the plan period, despite the urgent and unmet need for housing now.</p> <p>3.33 The above criticisms also apply to the SA's appraisal of Policy SP3 in relation to SA Objective 14.</p> <p>3.34 It is disingenuous for the appraisal to suggest that Option 1 (delivery far fewer homes than the minimum requirement, and only a fraction of the Borough's affordable housing need) would have the same impact on this Objective as planning to meet the Borough's minimum housing requirement in full.</p>	<p>also apply to the SA's appraisal of Policy SP3 in relation to SA Objective 14.</p> <p>3.34 It is disingenuous for the appraisal to suggest that Option 1 (delivery far fewer homes than the minimum requirement, and only a fraction of the Borough's affordable housing need) would have the same impact on this Objective as planning to meet the Borough's minimum housing requirement in full.</p>	
SA/SEA - 005 - 004			Ceres Property for Privo Land Ltd		<p>3.35 The SA's consideration of Policy SP3 in relation to Objectives 17 and 20 is also considered flawed. In each case, the justification for Option 1 being found to have positive impact, and the other options a negative impact, appears questionable.</p> <p>3.36 In respect of Objective 17, the appraisal overlooks the likely negative impacts on the vitality of existing settlements of failing to deliver sufficient homes to meet needs; or, conversely, the positive impacts additional housing is likely to have on existing centres.</p> <p>3.37 In respect of Objective 20, this again appears to be the case of the SA erroneously treating land</p>	<p>Objectives 17 and 20</p> <p>3.35 The SA's consideration of Policy SP3 in relation to Objectives 17 and 20 is also considered flawed. In each case, the justification for Option 1 being found to have positive impact, and the other options a negative impact, appears questionable.</p> <p>3.36 In respect of Objective 17, the appraisal overlooks the likely negative impacts on the vitality of existing settlements of failing to deliver sufficient homes to meet needs; or, conversely, the positive impacts additional housing is likely to have on existing centres.</p> <p>3.37 In respect of Objective 20, this again appears to be the case of the SA</p>	<p>Objective 17 is concerned with employment provision and economic growth.</p> <p>Objective 20 commentary takes a holistic view across South Essex.</p>

						beyond existing settlement boundaries are inherently remote and rural, when that is not the case. 3.38 The SA's approach to consider the options for addressing development needs is considered fundamentally flawed, and needs to be revisited to ensure that the DLP is capable of complying with the SEA Regulations.	erroneously treating land beyond existing settlement boundaries are inherently remote and rural, when that is not the case. 3.38 The SA's approach to consider the options for addressing development needs is considered fundamentally flawed, and needs to be revisited to ensure that the DLP is capable of complying with the SEA Regulations.	
SA/SEA - 005 - 005			Ceres Property for Privo Land Ltd			The SA and GB12 3.39 The SA includes appraisal of GB12 (Site ID40498) of which Privo's Site falls within this wider parcel. 3.40 The key site conclusions in respect of GB12 are set out in Table 5.2.41 and are copied in full below: “Four separate open spaces overlap the site. This may inhibit the ability to develop the site whilst maintaining the integrity of the current open space network, in addition to potentially needing to meet additional needs of new residents. The area has pre-existing quantity and access deficits of most types of open space (source: CPBC Open Space Study 2023). Local Wildlife Sites and Priority Habitats on site (Protected under 2006 NERC Act) - Good quality unimproved grassland (west section) and deciduous woodland (south-east) - Extent of these constraints mean harm would be difficult to avoid or mitigate on-site. Agricultural Land Quality Grade 3: Although the site does not appear to be in current arable use, its long-term loss (due to built development) for potential	The SA and GB12 3.39 The SA includes appraisal of GB12 (Site ID40498) of which Privo's Site falls within this wider parcel. 3.40 The key site conclusions in respect of GB12 are set out in Table 5.2.41 and are copied in full below: “Four separate open spaces overlap the site. This may inhibit the ability to develop the site whilst maintaining the integrity of the current open space network, in addition to potentially needing to meet additional needs of new residents. The area has pre-existing quantity and access deficits of most types of open space (source: CPBC Open Space Study 2023). Local Wildlife Sites and Priority Habitats on site (Protected under 2006 NERC Act) - Good quality unimproved grassland (west section) and deciduous woodland (south-east) - Extent of these constraints mean harm would be difficult to avoid or mitigate on-site. Agricultural Land Quality Grade 3: Although the site does not appear to be in current arable use, its long-term loss (due to built development) for potential	Open spaces: There is a mix of open spaces on site, including school grounds and a publicly accessible area of open space. The classification as open space stems from the Council's evidence base (Open Space Assessment 2023). Open spaces are afforded some policy protection under policy Infra4, so their presence of site is clearly relevant. Priority habitats identified via Natural England classification and inventory, available via MagicMap. The approach to agricultural land is consistent with emerging plan policy ENV6. In the absence of more detailed surveys, and in line with the precautionary principle, there will be an assumption that grade 3 areas should be protected from development. The NPPF is clear that areas of poorer quality land should be used instead of higher quality areas.

		<p>agricultural use is not something that could be mitigated. Included in IDP scenario 2 (Also broadly reflected in Options 2a to Policy SP3).”</p> <p>3.41 It is worth noting that the Site is within private ownership, and therefore not publicly accessible green space. As acknowledged previously, the release of sites such as Privo’s interests at 82 The Chase, can lead to the provision of on site open space to benefit existing locals and future residents. Moreover, a scheme will be required to contribute to improving existing provision locally.</p> <p>3.42 The broad assessment of the parcel of GB12 providing good quality unimproved grassland in the western section and deciduous woodland in the south-east, is considered unfounded. The land within the west is privately owned and there have been no assessments undertaken on site, to the landowner’s knowledge, that that confirms as such. Moreover, a parcel within the wider GB12 parcel which was subject an appeal, confirms the site did not meet the standard and quality anticipated for the designation, explored in more detail below.</p> <p>3.43 Further to the assessment work listed above within the SA for the GB12 parcel, the assessment suggests that although the site does not appear to be in current arable use the loss of the land to development would not be mitigated. The land within GB12 forms a disjointed patchwork of</p>	<p>agricultural use is not something that could be mitigated. Included in IDP scenario 2 (Also broadly reflected in Options 2a to Policy SP3).”</p> <p>3.41 It is worth noting that the Site is within private ownership, and therefore not publicly accessible green space. As acknowledged previously, the release of sites such as Privo’s interests at 82 The Chase, can lead to the provision of on site open space to benefit existing locals and future residents. Moreover, a scheme will be required to contribute to improving existing provision locally.</p> <p>3.42 The broad assessment of the parcel of GB12 providing good quality unimproved grassland in the western section and deciduous woodland in the south-east, is considered unfounded. The land within the west is privately owned and there have been no assessments undertaken on site, to the landowner’s knowledge, that that confirms as such. Moreover, a parcel within the wider GB12 parcel which was subject an appeal, confirms the site did not meet the standard and quality anticipated for the designation, explored in more detail below.</p> <p>3.43 Further to the assessment work listed above within the SA for the GB12 parcel, the assessment suggests that although the site does not appear to be in current arable use the loss of the land to development would not be mitigated. The land within GB12 forms a disjointed patchwork of</p>	
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			<p>privately owned small parcels of land. It is not considered realistic or practical to assume the parcels will ever be brought back into food production.</p> <p>3.44 It is worth reiterating that, as the judgment in Stonegate confirms, it is necessary for the SA to be based on objective evidence and to have regard to evidence. In Stonegate the judgment criticised the SEA and plan for failing to integrate new, material evidence from a planning appeal about highways impacts, thereby breaching SEA Regulations requiring an evidence-based, objective assessment of alternatives with up-to-date information.</p> <p>3.45 The SA's consideration of GB12 suggests a similar defect in this case as that in Stonegate.</p> <p>3.46 Proposals for a residential development on part of GB12 / ID40498 was subject of an appeal (APP/M1520/W/24/3356256) which was allowed on 5th August 2025.</p> <p>3.47 The appeal decision confirmed a lack of any concerns regarding the residential development on part of the GB12 parcel. Moreover, the main issues within the appeal, which focussed on the effect of the proposals on biodiversity and protected species; effect on the integrity of protected European sites; and whether the appeal site is grey belt land or whether the proposal would be inappropriate development in the green belt, concluded that the proposals would have an acceptable effect on biodiversity and protected species; would not have a</p>	<p>privately owned small parcels of land. It is not considered realistic or practical to assume the parcels will ever be brought back into food production.</p> <p>3.44 It is worth reiterating that, as the judgment in Stonegate confirms, it is necessary for the SA to be based on objective evidence and to have regard to evidence. In Stonegate the judgment criticised the SEA and plan for failing to integrate new, material evidence from a planning appeal about highways impacts, thereby breaching SEA Regulations requiring an evidence-based, objective assessment of alternatives with up-to-date information.</p> <p>3.45 The SA's consideration of GB12 suggests a similar defect in this case as that in Stonegate.</p> <p>3.46 Proposals for a residential development on part of GB12 / ID40498 was subject of an appeal (APP/M1520/W/24/3356256) which was allowed on 5th August 2025.</p> <p>3.47 The appeal decision confirmed a lack of any concerns regarding the residential development on part of the GB12 parcel. Moreover, the main issues within the appeal, which focussed on the effect of the proposals on biodiversity and protected species; effect on the integrity of protected European sites; and whether the appeal site is grey belt land or whether the proposal would be inappropriate development in the green belt, concluded that the proposals would have an acceptable effect on biodiversity and protected species; would not have a</p>	
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				<p>significant effect on the integrity of a protected European site through the proposed appropriate mitigation; and concluding that all the tests within the Framework (para 155-157) are satisfied and the development is not inappropriate in the Green Belt.</p> <p>3.48 The Inspector found that the proposals accord with the development plan, read as a whole and that material consideration did not indicate that a decision should be taken otherwise than in accordance with the development plan.</p> <p>3.49 It is interesting to note that the appeal decision referenced the site as being agricultural land, commenting that there is no substantive evidence the site could be used in viable way for agricultural production. The Inspector did not assign nor attribute the change of use of the land from agricultural to residential use as carrying notable weight in the planning judgement.</p> <p>3.50 The SA Annexes report that the development of GB12 would have minor negative impacts or significant negative impacts in relation to proximity to Local Wildlife Sites, priority habitats, TPOs, historic landscape (- / ?), agricultural land quality, distance to listed buildings, archaeology, and critical drainage areas. This is despite the planning application and appeal decision on part of GB12 parcel having confirmed no concerns pertaining to ecology, drainage or flood risk. None of these factors justify rejection of the site, as</p>	<p>significant effect on the integrity of a protected European site through the proposed appropriate mitigation; and concluding that all the tests within the Framework (para 155-157) are satisfied and the development is not inappropriate in the Green Belt.</p> <p>3.48 The Inspector found that the proposals accord with the development plan, read as a whole and that material consideration did not indicate that a decision should be taken otherwise than in accordance with the development plan.</p> <p>3.49 It is interesting to note that the appeal decision referenced the site as being agricultural land, commenting that there is no substantive evidence the site could be used in viable way for agricultural production. The Inspector did not assign nor attribute the change of use of the land from agricultural to residential use as carrying notable weight in the planning judgement.</p> <p>3.50 The SA Annexes report that the development of GB12 would have minor negative impacts or significant negative impacts in relation to proximity to Local Wildlife Sites, priority habitats, TPOs, historic landscape (- / ?), agricultural land quality, distance to listed buildings, archaeology, and critical drainage areas. This is despite the planning application and appeal decision on part of GB12 parcel having confirmed no concerns pertaining to ecology, drainage or flood risk. None of these factors justify rejection of the site, as</p>
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				<p>the SA suggests.</p> <p>3.51 The SA continues that the site is “Agricultural Land Quality” Grade 3. However, it fails to state whether it considers the site to be Grade 3a (part of the ‘best and most versatile’ land category); Grade 3b (not considered best and most versatile). Furthermore, the SA fails to acknowledge that the site is not in agricultural use, or explain why or how it could be feasibly brought back into agricultural use.</p> <p>3.52 It should be recognised that in Stonegate it was the failure to properly consider through the SEA of the plan, evidence in relation to one factor (highways impacts) that had been established through a planning appeal. In the case of the DLP, it is clear that the SA fails to account for numerous factors established through an, albeit recent, appeal, even to the point where benefit of the site’s development confirmed through the appeal have been recorded incorrectly as negative effects by the SA.</p> <p>3.53 As in Stonegate, the evaluation of likely environmental effects by the SA appears to ignore objective evidence, reaching unsupported conclusions. Consequently, resulting in an inaccurate and unreasonable assessment of GB12. As a result, we do not consider the DLP to meet the SEA Regulations.</p>	<p>the SA suggests.</p> <p>3.51 The SA continues that the site is “Agricultural Land Quality” Grade 3. However, it fails to state whether it considers the site to be Grade 3a (part of the ‘best and most versatile’ land category); Grade 3b (not considered best and most versatile). Furthermore, the SA fails to acknowledge that the site is not in agricultural use, or explain why or how it could be feasibly brought back into agricultural use.</p> <p>3.52 It should be recognised that in Stonegate it was the failure to properly consider through the SEA of the plan, evidence in relation to one factor (highways impacts) that had been established through a planning appeal. In the case of the DLP, it is clear that the SA fails to account for numerous factors established through an, albeit recent, appeal, even to the point where benefit of the site’s development confirmed through the appeal have been recorded incorrectly as negative effects by the SA.</p> <p>3.53 As in Stonegate, the evaluation of likely environmental effects by the SA appears to ignore objective evidence, reaching unsupported conclusions. Consequently, resulting in an inaccurate and unreasonable assessment of GB12. As a result, we do not consider the DLP to meet the SEA Regulations.</p>
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SA/SEA - 006- 001	Ceres Property for Rainer Developments		<p>3.1 The preparation of the new Castle Point Local Plan must comply with the Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No.1633) ('the SEA Regulations'), which transposes the plan-making elements of European Directive 2001/42/EC ('the SEA Directive') into UK law.</p> <p>3.2 The SEA Regulations require that an Environmental Report is prepared. In this case, the Council appears to be seeking to discharge its obligation through the 'Strategic Environmental Assessment (SEA) and Sustainability Appraisal Accompanying the Regulation 19 Submission Version of the Castle Point Plan July 2025' ('the SA')</p> <p>3.3 The SA is required to identify, describe, and evaluate the likely significant effects on the environment of proposed options, as well as on reasonable alternatives (Regulation 12(2) of the SEA Regulations).</p> <p>3.4 Regulation 12(3) further sets out the information required to be included within the SA, referencing Schedule 2 of the SEA Regulations.</p> <p>3.5 Schedule 2 states that SA/SEA should consider short, medium and long term effects; permanent and temporary effects; positive and negative effects; and secondary, cumulative and synergistic effects.</p> <p>3.6 As confirmed through case law (see Heard1), whilst it is not necessary to keep open all options for the same level of detail,</p>	<p>The SA and SP3 Evolving National Guidance</p> <p>3.11 It is understood that the SA Scoping Report predates the publication of the 2024 NPPF and accompanying PPG, which confirm how Local Planning Authorities must approach the calculation of local housing need, and the use of such figures as the minimum number of new homes for which to plan. It is unclear why the reasonable options have not been updated to reflect options that national policy give Local Planning Authorities in respect of addressing development needs. In order to be capable of being found sound, the DLP is required to inter alia be consistent with national policy. Consequently, the options should have been updated to ensure that they test what the actual reasonable alternatives are within the context of a Local Plan that is required to address housing needs in full.</p> <p>Affordable Housing</p> <p>3.12 Separately, an additional overarching concern in respect of the SA's appraisal of Policy SP3 is the seeming lack of acknowledgement of the severity of the Borough's affordable housing shortage, or the issue regarding the affordability of housing in the area.</p> <p>3.13 The Castle Point Local Housing Needs Assessment Update (2025) ('the LHNA Update') estimates there are currently 3,220 households in the Borough living in unsuitable housing and are unable to afford their own housing; and projects a net</p>	<p><u>Evolving National Guidance</u></p> <p>The assessment of options for Policy SP3 is clear that option 3 stems directly from the December 2024 NPP, clearly updating since the scoping report in line with national policy requirements..</p> <p><u>Affordable Housing</u></p> <p>Objective 12 assessment positive is in the context of Plan para 13.9 noting that 1,458 new homes need to be affordable which equates to 86 affordable homes p.a. across the Plan period, or 24% of the total supply, and the Council's target is to deliver this quantum of affordable housing.</p> <p><u>Objective 1 Biodiversity.</u></p> <p>The ecological value of options has clearly been set out throughout the report.</p> <p><u>Objective 10</u></p> <p>Areas served by existing public transport networks, as well as being hubs for multiple routes are considered to be inherently more sustainable.</p>
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				<p>examination at all stages, at each stage the preferred option and reasonable alternatives must be assessed to the same level of detail. This includes considering alternatives for any modifications to a plan, even if late in the plan-making process.</p> <p>3.7 Furthermore, it is critical for compliance with the SEA Regulations that the SA presents an accurate picture of alternatives based on robust, objective, factual evidence rather than assumptions or public sentiment. (see <i>Stonegate Homes Ltd v Horsham District Council [2016] EWHC 2512</i>) ('Stonegate').</p> <p>3.8 Separately, the NPPF makes clear that a sustainable appraisal that meets the relevant legal requirements should inform the preparation of a Local Plan throughout its process – the SA is relevant to not only the DLP's legal compliance, but also its soundness.</p> <p>1 <i>Heard v Broadland District Council [2012] EWHC 344 (Admin)</i></p> <p>The SA and SP3</p> <p>3.9 The SA explains that there were four options considered in respect of Policy SP3 (Meeting Development Needs).</p> <p>1. Preferred Policy: Limit new development to brownfield sites within the urban area.</p> <p>No Green Belt Allocations</p> <p>2a. Release a limited number of approximately 5 Green/Grey Belt sites</p> <p>2b. Release a larger number of approximately 10 larger Green Belt sites</p> <p>3. National Standard Method target which equates to 701 new homes (686 March 2025 updated figure) per annum)</p>	<p>need for a total of 3,976 affordable homes over the period 2026-2043. This equates to 234 affordable dwellings per annum (dpa). This represents a substantial proportion of the total number of new homes the DLP proposes to deliver. Indeed, in the first five-year of the plan, the DLP proposes to deliver fewer homes in total than the affordable housing need. The failure of the SA to properly consider this issue is relevant to various elements of the appraisal, as discussed later within this section of these representations.</p> <p>Objective 1 Biodiversity.</p> <p>3.15 Objective 1 concerns both the protection and enhancement of biodiversity. The SA considers, in short, that the greater housing growth options, the more negative the impact in relation to this objective. The accompanying commentary in relation to Policy SP3 and this objective seems to be based on the view that higher growth options would inevitably entail development of areas that of ecological value. However, the evidence as to how much housing development could be delivered without loss of ecologically valuable land is unclear.</p> <p>3.16 It should be recognised that development is required to be accompanied by biodiversity net gain (BNG). In simplistic terms, the more development the more BNG would be delivered. The SA appears dismissive of this, stating that "habitats and species may take decades or more to become established</p>
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			<p>over the plan period (11,662 over period 2026-2043)</p> <p>3.10 It is explained at paragraph 4.4.2 of the SA that these four options are derived from the SA Scoping Report.</p> <p>3.11 It is understood that the SA Scoping Report predates the publication of the 2024 NPPF and accompanying PPG, which confirm how Local Planning Authorities must approach the calculation of local housing need, and the use of such figures as the minimum number of new homes for which to plan. It is unclear why the reasonable options have not been updated to reflect options that national policy give Local Planning Authorities in respect of addressing development needs. In order to be capable of being found sound, the DLP is required to inter alia be consistent with national policy. Consequently, the options should have been updated to ensure that they test what the actual reasonable alternatives are within the context of a Local Plan that is required to address housing needs in full.</p> <p>3.12 Separately, an additional overarching concern in respect of the SA's appraisal of Policy SP3 is the seeming lack of acknowledgement of the severity of the Borough's affordable housing shortage, or the issue regarding the affordability of housing in the area.</p> <p>3.13 The Castle Point Local Housing Needs Assessment Update (2025) ('the LHNA Update') estimates there are currently 3,220 households in the Borough living in</p>	<p>and reach a stage of ecological maturity (500 years in the case of ancient woodland)." But there is nothing to suggest that higher growth options would necessitate loss of Ancient Woodland or that only Ancient Woodland would provide the necessary BNG. Objective 10</p> <p>3.17 Objective 10 concerns reduction of the need to travel by private car and promotion of sustainable forms of transport. Option 1 is the only one that is appraised as not having a negative impact on this objective; with Option 2a assessed as 'minor negative' and Options 2b and 3 as 'significant negative'.</p> <p>3.18 In seeking to justify this, the commentary states that "Green Belt development would exacerbate the car-dependency issue as these would be less well served by bus services and more remote from existing services. Development focused on existing centres may help facilitate this objective, by locating residents close by existing services and existing sustainable transport options". However, this presupposes that Green Belt sites are inherently remote and impossible to be served by public transport. This is not the case, particularly in respect of the Borough. The Green Belt boundary is drawn tightly around the existing built-up areas of the Borough's settlements, and thus includes land that is in close proximity to facilities and services, and capable of being served by public transport (including sites that are located along public</p>	
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				<p>unsuitable housing and are unable to afford their own housing; and projects a net need for a total of 3,976 affordable homes over the period 2026-2043. This equates to 234 affordable dwellings per annum (dpa). This represents a substantial proportion of the total number of new homes the DLP proposes to deliver. Indeed, in the first five-year of the plan, the DLP proposes to deliver fewer homes in total than the affordable housing need. The failure of the SA to properly consider this issue is relevant to various elements of the appraisal, as discussed later within this section of these representations.</p> <p>3.14 There are evident flaws in how the SA has appraised the options for Policy SP3 in relation to following specific SA objectives.</p> <p>3.15 Objective 1 concerns both the protection and enhancement of biodiversity. The SA considers, in short, that the greater housing growth options, the more negative the impact in relation to this objective. The accompanying commentary in relation to Policy SP3 and this objective seems to be based on the view that higher growth options would inevitably entail development of areas that of ecological value. However, the evidence as to how much housing development could be delivered without loss of ecologically valuable land is unclear.</p> <p>3.16 It should be recognised that development is required to be accompanied by biodiversity net gain (BNG). In simplistic terms, the more</p>	<p>transport corridors). It also fails to consider that the low growth option (Option 1) has the potential to increase the need for travel by private car, for example forcing members of the community and employees of local businesses to meet their accommodation needs outside of the Borough, increasing the need to commute longer distances.</p>
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development the more BNG would be delivered. The SA appears dismissive of this, stating that “habitats and species may take decades or more to become established and reach a stage of ecological maturity (500 years in the case of ancient woodland).” But there is nothing to suggest that higher growth options would necessitate loss of Ancient Woodland or that only Ancient Woodland would provide the necessary BNG. 3.17 Objective 10 concerns reduction of the need to travel by private car and promotion of sustainable forms of transport. Option 1 is the only one that is appraised as not having a negative impact on this objective; with Option 2a assessed as ‘minor negative’ and Options 2b and 3 as ‘significant negative’. 3.18 In seeking to justify this, the commentary states that “Green Belt development would exacerbate the car-dependency issue as these would be less well served by bus services and more remote from existing services. Development focused on existing centres may help facilitate this objective, by locating residents close by existing services and existing sustainable transport options”. However, this presupposes that Green Belt sites are inherently remote and impossible to be served by public transport. This is not the case, particularly in respect of the Borough. The Green Belt boundary is drawn tightly around the existing built-up areas of the Borough’s settlements, and thus includes land that is in

						close proximity to facilities and services, and capable of being served by public transport (including sites that are located along public transport corridors). It also fails to consider that the low growth option (Option 1) has the potential to increase the need for travel by private car, for example forcing members of the community and employees of local businesses to meet their accommodation needs outside of the Borough, increasing the need to commute longer distances.		
SA/SEA - 006-002			Ceres Property for Rainer Developments			<p>3.19 In respect of SA Objective 11 (“improve the quality, range, and accessibility to essential services, facilities, green infrastructure and open space”) Option 1 is assed as having a ‘minor positive’ / ‘minor negative’ impact, whereas the other options in which more homes are provided, including through Green Belt development) are assessed as having a ‘minor negative’ or ‘significant negative’ impacts.</p> <p>3.20 The commentary in relation to SA Objective 11 suggests that any Green Belt development would inherently involve provision of housing in locations from which facilities and services will be inaccessible.</p>	<p>Objective 11</p> <p>3.19 In respect of SA Objective 11 (“improve the quality, range, and accessibility to essential services, facilities, green infrastructure and open space”) Option 1 is assed as having a ‘minor positive’ / ‘minor negative’ impact, whereas the other options in which more homes are provided, including through Green Belt development) are assessed as having a ‘minor negative’ or ‘significant negative’ impacts.</p> <p>3.20 The commentary in relation to SA Objective 11 suggests that any Green Belt development would inherently involve provision of housing in locations from which facilities and services will be inaccessible.</p>	Noted

				<p>However, it is clear that there are multiple Green Belt sites that are well-related to a number of facilities and services in the Borough.</p> <p>3.21 The commentary goes on to state that “Development focused on existing centres may help facilitate this objective for most services”. However, this appears based on the false premise that development within centres and on a limited number of Green Belt sites would be mutually exclusive, whereas the reality is that both could be provided. It also overlooks the clearly limited capacity to deliver homes within existing centres, and the potential negative impacts of not having sufficient residents to ensure services can be sustained.</p> <p>3.22 The commentary also states “there are pre-existing open space deficits that will be difficult to fully address, e.g. six wards in the Borough have no access to youth play space” and that “contributions to address this will be competing with a limited pot that also serves wider needs, e.g. health, education, affordable housing, etc”. This commentary only supports seeking to achieve the minimum housing requirement, rather than the much lower figure proposed by the DLP, in order to help facilitate provision of additional youth play space, and ensure greater contributions to additional public open space through such higher levels of new development. It is important to recognise that much of the Borough’s Green Belt is not publicly accessible and</p>	<p>will be inaccessible.</p> <p>However, it is clear that there are multiple Green Belt sites that are well-related to a number of facilities and services in the Borough.</p> <p>3.21 The commentary goes on to state that “Development focused on existing centres may help facilitate this objective for most services”. However, this appears based on the false premise that development within centres and on a limited number of Green Belt sites would be mutually exclusive, whereas the reality is that both could be provided. It also overlooks the clearly limited capacity to deliver homes within existing centres, and the potential negative impacts of not having sufficient residents to ensure services can be sustained.</p> <p>3.22 The commentary also states “there are pre-existing open space deficits that will be difficult to fully address, e.g. six wards in the Borough have no access to youth play space” and that “contributions to address this will be competing with a limited pot that also serves wider needs, e.g. health, education, affordable housing, etc”. This commentary only supports seeking to achieve the minimum housing requirement, rather than the much lower figure proposed by the DLP, in order to help facilitate provision of additional youth play space, and ensure greater contributions to additional public open space through such higher levels of new development. It is important to recognise that much of the Borough’s Green Belt is not</p>
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					<p>currently has no recreational value – development of Green Belt does not need to entail loss of public open space, but rather is likely to increase the provision of such, as new development will incorporate public open spaces.</p> <p>3.23 The appraisal of the options in relation to SA Objective 11 is entirely flawed, for the reasons set out above.</p>	<p>publicly accessible and currently has no recreational value – development of Green Belt does not need to entail loss of public open space, but rather is likely to increase the provision of such, as new development will incorporate public open spaces.</p> <p>3.23 The appraisal of the options in relation to SA Objective 11 is entirely flawed, for the reasons set out above.</p>	
SA/SEA - 006-003			Ceres Property for Rainer Developments		<p>SA Objective 12</p> <p>3.24 Turning to SA Objective 12, the approach to appraisal of the options is one of the most problematic elements of the SA. This SA objective is “To reduce poverty, deprivation and social exclusion”.</p> <p>3.25 The SA commentary notes “Development in centres most likely to contribute towards regeneration, enhance the realm and facilitate engagement and participation in community/cultural activities”; and also “new housing development may help some on to the housing ladder and help address social exclusion to some extent”.</p> <p>3.26 The SA appraisal assesses each option as having the same impact (‘minor positive’ / ‘possibility of either positive or negative impacts, or general</p>	<p>SA Objective 12</p> <p>3.24 Turning to SA Objective 12, the approach to appraisal of the options is one of the most problematic elements of the SA. This SA objective is “To reduce poverty, deprivation and social exclusion”.</p> <p>3.25 The SA commentary notes “Development in centres most likely to contribute towards regeneration, enhance the realm and facilitate engagement and participation in community/cultural activities”; and also “new housing development may help some on to the housing ladder and help address social exclusion to some extent”.</p> <p>3.26 The SA appraisal assesses each option as having the same impact (‘minor positive’ / ‘possibility of either positive or negative impacts, or general</p>	<p>The link between housing development and social exclusion is recognised, but it is not the only factor contributing to this objective.</p> <p>Whilst all options would see development/regeneration in centres, option 1 sses the greatest proportion of total development being located in centres, thereby maximising the relative social inclusion benefits.</p>

				<p>uncertainty'). This is a patently unfeasible position for the SA to adopt, for a number of reasons.</p> <p>3.27 Firstly, the SA fails to properly recognise the importance of ensuring people have access to appropriate, affordable, housing, including in relation to SA Objective 12. Below we summarise just some of the issues that are caused by a lack of sufficient accommodation, that we suggest should be considered in an update to the SA:</p> <ul style="list-style-type: none"> • Homelessness. The Government reports that on 31 March 2024, 117,450 households were in temporary accommodation, which is an increase of 12.3% from 31 March 2023. Shelter estimates that 354,016 people were homeless in England on a given night in 2024. Many people living in temporary accommodation have been trapped in such accommodation for over 10 years². • Overcrowding. In 2023, the National Housing Federation reported that 3.4 million people in England were living in overcrowded housing. It found that in 41% of overcrowded homes, children or teenagers had to share a bedroom with adults. It also reported that 77% of families living in overcrowded homes reported this had negatively affected their mental health; and that 56% of children in such accommodation were likely to experience negative health impacts. 	<p>uncertainty'). This is a patently unfeasible position for the SA to adopt, for a number of reasons.</p> <p>3.27 Firstly, the SA fails to properly recognise the importance of ensuring people have access to appropriate, affordable, housing, including in relation to SA Objective 12. Below we summarise just some of the issues that are caused by a lack of sufficient accommodation, that we suggest should be considered in an update to the SA:</p> <ul style="list-style-type: none"> • Homelessness. The Government reports that on 31 March 2024, 117,450 households were in temporary accommodation, which is an increase of 12.3% from 31 March 2023. Shelter estimates that 354,016 people were homeless in England on a given night in 2024. Many people living in temporary accommodation have been trapped in such accommodation for over 10 years². • Overcrowding. In 2023, the National Housing Federation reported that 3.4 million people in England were living in overcrowded housing. It found that in 41% of overcrowded homes, children or teenagers had to share a bedroom with adults. It also reported that 77% of families living in overcrowded homes reported this had negatively affected their mental health; and that 56% of children in such accommodation were likely to experience negative health impacts.
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				<p>Housing suitability. A 2023 study³ found that, nationally, over 240,000 households were experiencing the worst forms of homelessness. This includes sleeping on the streets, or being stuck in unsuitable temporary accommodation such as nightly paid B&Bs.</p> <ul style="list-style-type: none"> • Health impacts. Research⁴ has identified that 73% of people on social housing waiting lists across the UK experienced problems with their accommodation that is harmful to their health. 62% reported the condition of their current accommodation was negatively impacting their mental health. • Increased pressure on welfare. The lack of housing results in increase government expenditure on matters such as temporary accommodation, as well as on addressing issues generated or exacerbated by the lack of housing, such as health. • Unaffordable housing. The shortage of housing has resulted in a significant worsening of housing affordability, with the ratio of average house prices to average earnings having vastly increased in recent years. The ratio of median house price to median gross annual workplace-based earnings for the Borough in 1998, when the Council last adopted a Local Plan, was 3.77. In 2024 it was 9.31, and the average over the last five years is 11.28. This has made home ownership extremely challenging for 	<p>Housing suitability. A 2023 study³ found that, nationally, over 240,000 households were experiencing the worst forms of homelessness. This includes sleeping on the streets, or being stuck in unsuitable temporary accommodation such as nightly paid B&Bs.</p> <ul style="list-style-type: none"> • Health impacts. Research⁴ has identified that 73% of people on social housing waiting lists across the UK experienced problems with their accommodation that is harmful to their health. 62% reported the condition of their current accommodation was negatively impacting their mental health. • Increased pressure on welfare. The lack of housing results in increase government expenditure on matters such as temporary accommodation, as well as on addressing issues generated or exacerbated by the lack of housing, such as health. • Unaffordable housing. The shortage of housing has resulted in a significant worsening of housing affordability, with the ratio of average house prices to average earnings having vastly increased in recent years. The ratio of median house price to median gross annual workplace-based earnings for the Borough in 1998, when the Council last adopted a Local Plan, was 3.77. In 2024 it was 9.31, and the average over the last five years is 11.28. This has made home ownership extremely challenging for
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				<p>many.</p> <ul style="list-style-type: none"> Education and development. Children in unstable or poor housing tend to do worse: disruptions, absences, fatigue, worse conditions for studying⁵. Delayed independence and postponement of family planning. The unaffordability of housing has contributed to an increase in the average age at which people buy their first home – 34 as of 2022/23⁶. Economic impact. The lack of housing impairs labour mobility, which impacts on the formation of new businesses and the retention of existing ones due to resultant recruitment issues. The increased cost of housing as a result of a lack of supply also has negative impacts in terms of people having less money available to spend locally. Public services recruitment. Research produced by Centre for Cities noted that the NHS, police, and schools have all experienced difficulties in recruiting that have been linked to unaffordability of housing within certain areas. <p>3.28 The above demonstrates just how critical the issue of providing sufficient housing is for social and economic objectives. These issues are very germane to Castle Point Borough and the DLP, given the extent of affordable housing need in the Borough and the lack of an existing supply.</p> <p>3.29 It is extremely disconcerting that, despite</p>	<p>many.</p> <ul style="list-style-type: none"> Education and development. Children in unstable or poor housing tend to do worse: disruptions, absences, fatigue, worse conditions for studying⁵. Delayed independence and postponement of family planning. The unaffordability of housing has contributed to an increase in the average age at which people buy their first home – 34 as of 2022/23⁶. Economic impact. The lack of housing impairs labour mobility, which impacts on the formation of new businesses and the retention of existing ones due to resultant recruitment issues. The increased cost of housing as a result of a lack of supply also has negative impacts in terms of people having less money available to spend locally. Public services recruitment. Research produced by Centre for Cities noted that the NHS, police, and schools have all experienced difficulties in recruiting that have been linked to unaffordability of housing within certain areas. <p>3.28 The above demonstrates just how critical the issue of providing sufficient housing is for social and economic objectives. These issues are very germane to Castle Point Borough and the DLP, given the extent of affordable housing need in the Borough and the lack of an existing supply.</p> <p>3.29 It is extremely disconcerting that, despite</p>
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				<p>the evident acute shortage of housing (and affordable housing in particular) in the Borough, the potential consequences of this – and the benefits of this being addressed – have not been properly considered by the SA.</p> <p>3.30 To simply state that “new housing...may help some on the housing ladder and help address social exclusion to some extent” (emphasis added), and then to appraise an option which would deliver vastly fewer homes (including affordable homes) as having the same impacts as options that would make a much greater contribution, is considered irrational.</p> <p>3.31 Furthermore, the SA appears to have little to no regard to the LHNA Update findings regarding the scale of affordable housing need (495 affordable dpa) compared to the number of affordable homes the Council’s Housing Topic Paper 2025 suggests the DLP (i.e. Policy SP3 Option 1) will deliver – a mere 86 affordable dpa. The SA fails to properly consider the potential very significant negative social and economic effects of planning to allow such a scale of affordable housing need to go unmet.</p> <p>3.32 Even if the above defect did not render the SA in breach of the SEA Regulations, it would nevertheless represent a fundamental defect in terms of the DLP’s soundness, given the role the SA should play in justifying options selected and those rejected.</p> <p>3.33 Separately, we do not consider that the SA has</p>	<p>the evident acute shortage of housing (and affordable housing in particular) in the Borough, the potential consequences of this – and the benefits of this being addressed – have not been properly considered by the SA.</p> <p>3.30 To simply state that “new housing...may help some on the housing ladder and help address social exclusion to some extent” (emphasis added), and then to appraise an option which would deliver vastly fewer homes (including affordable homes) as having the same impacts as options that would make a much greater contribution, is considered irrational.</p> <p>3.31 Furthermore, the SA appears to have little to no regard to the LHNA Update findings regarding the scale of affordable housing need (495 affordable dpa) compared to the number of affordable homes the Council’s Housing Topic Paper 2025 suggests the DLP (i.e. Policy SP3 Option 1) will deliver – a mere 86 affordable dpa. The SA fails to properly consider the potential very significant negative social and economic effects of planning to allow such a scale of affordable housing need to go unmet.</p> <p>3.32 Even if the above defect did not render the SA in breach of the SEA Regulations, it would nevertheless represent a fundamental defect in terms of the DLP’s soundness, given the role the SA should play in justifying options selected and those rejected.</p> <p>3.33 Separately, we do not consider that the SA has</p>
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				<p>properly considered the temporal aspects of the options in relation to this SA Objective – that the DLP proposals involve not only providing far fewer homes than required, but delaying delivery of homes until the latter part of plan period, when there is a significant unmet need for new homes now.</p>	<p>properly considered the temporal aspects of the options in relation to this SA Objective – that the DLP proposals involve not only providing far fewer homes than required, but delaying delivery of homes until the latter part of plan period, when there is a significant unmet need for new homes now.</p>
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SA/SEA - 006- 004	Ceres Property for Rainer Developments		<p>SA Objective 14</p> <p>3.34 The above criticisms also apply to the SA's appraisal of Policy SP3 in relation to SA Objective 14 ("To provide appropriate housing and accommodation to meet existing and future needs of the whole community")</p> <p>3.35 It is also very misleading for the appraisal to suggest that Option 1 (delivery of far fewer homes than the minimum requirement, and only a fraction of the Borough's affordable housing need) would have the same impact on SA Objective 14 as planning to meet the Borough's minimum housing requirement in full.</p> <p>3.36 When one option (Option 1) objectively fails to meet housing needs, it is irrational to suggest it would have a significant positive impact in relation to an SA objective which is seeking to achieve the opposite. The SA's conclusions appear to be based on misplaced reliance on the Local Housing Needs Assessment's 2023 conclusion regarding the number of new homes required – far fewer homes than the Borough is required to deliver in order to play its role in addressing the national housing crisis. We note the commentary states: "The Local Housing Needs Assessment 2023 identified an Objectively Assessed Need (OAN) of 255 per annum for Castle Point, 197 of which are derived from the 10-year migration trend. "Therefore, a comparatively low figure would meet the aims of SA Objective 14 which are to meet the needs</p>	<p>SA Objective 14</p> <p>3.34 The above criticisms also apply to the SA's appraisal of Policy SP3 in relation to SA Objective 14 ("To provide appropriate housing and accommodation to meet existing and future needs of the whole community")</p> <p>3.35 It is also very misleading for the appraisal to suggest that Option 1 (delivery of far fewer homes than the minimum requirement, and only a fraction of the Borough's affordable housing need) would have the same impact on SA Objective 14 as planning to meet the Borough's minimum housing requirement in full.</p> <p>3.36 When one option (Option 1) objectively fails to meet housing needs, it is irrational to suggest it would have a significant positive impact in relation to an SA objective which is seeking to achieve the opposite. The SA's conclusions appear to be based on misplaced reliance on the Local Housing Needs Assessment's 2023 conclusion regarding the number of new homes required – far fewer homes than the Borough is required to deliver in order to play its role in addressing the national housing crisis. We note the commentary states: "The Local Housing Needs Assessment 2023 identified an Objectively Assessed Need (OAN) of 255 per annum for Castle Point, 197 of which are derived from the 10-year migration trend. "Therefore, a comparatively low figure would meet the aims of SA Objective 14 which are to meet the needs</p>	<p>SA Objective 14 in relation to Policy SP3</p> <p>states 'The Local Housing Needs Assessment 2023 identified an Objectively Assessed Need (OAN) of 255 per annum for Castle Point, 197 of which are derived from the 10-year migration trend. Therefore, a comparatively low figure would meet the aims of SA Objective 14 which are to meet the needs of the community, in this case - Castle Point. Option 1 equates to approximately the plan policy figure per annum, which potentially meets the OAN in full, including the migration trend allowance and is therefore a positive.'</p>
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				<p>of the community, in this case - Castle Point. “Option 1 equates to approximately the plan policy figure per annum, which potentially meets the OAN in full, including the migration trend allowance and is therefore a positive. “Options 2a, 2b and 3 exceed this figure but provide no additional benefits in terms of SA objective 14 meeting the needs of the community (Castle Point in this case)”. 3.37 The above suggests consideration of Policy SP3 in relation to SA Objective 14 has taken a highly questionable, narrow, and essentialist view of what constitutes ‘the community’ – that this only applies to existing residents of the Borough. Furthermore, and for the reasons discussed in paragraph 3.40 of this representation, the SA effectively narrows the definition of ‘the community’ to only include existing residents who are not in housing need. As discussed in paragraph 3.40, this excludes a significant number of the Borough’s current residents. 3.38 However, even if one were to put such concerns to one side, and to accept that benefits to the community are only valid if to existing residents of the Borough, the thinking is fundamentally flawed for two reasons. 3.39 Firstly, the Borough is not an island. It experiences net migration from London in particular. Refusing to provide sufficient homes will not necessarily stop such migration, but it will potentially constrain supply and further reduce</p>	<p>of the community, in this case - Castle Point. “Option 1 equates to approximately the plan policy figure per annum, which potentially meets the OAN in full, including the migration trend allowance and is therefore a positive. “Options 2a, 2b and 3 exceed this figure but provide no additional benefits in terms of SA objective 14 meeting the needs of the community (Castle Point in this case)”. 3.37 The above suggests consideration of Policy SP3 in relation to SA Objective 14 has taken a highly questionable, narrow, and essentialist view of what constitutes ‘the community’ – that this only applies to existing residents of the Borough. Furthermore, and for the reasons discussed in paragraph 3.40 of this representation, the SA effectively narrows the definition of ‘the community’ to only include existing residents who are not in housing need. As discussed in paragraph 3.40, this excludes a significant number of the Borough’s current residents. 3.38 However, even if one were to put such concerns to one side, and to accept that benefits to the community are only valid if to existing residents of the Borough, the thinking is fundamentally flawed for two reasons. 3.39 Firstly, the Borough is not an island. It experiences net migration from London in particular. Refusing to provide sufficient homes will not necessarily stop such migration, but it will potentially constrain supply and further reduce</p>
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			<p>affordability of housing in the Borough. In such a scenario, the limited supply of homes will of course be taken by those able to afford them. This may not be newly forming households in the Borough, particularly if such potential buyers are forced to compete for limited homes with those moving out of London, who may well be moving with significant equity.</p> <p>3.40 Additionally, and more immediately, the SA's approach to this entirely fails to consider one of the key findings of the LHNA: that there are currently 3,220 households in the Borough living in unsuitable housing and are unable to afford their own housing. Additionally, this number is projected to increase to a net need for a total of 3,976 affordable homes over the period 2026-2043. Such households are inarguably part of 'the community', no matter how narrowly the Council may wish to seek to define this. Option 1 will fail the vast majority of these members of the community, significantly underdelivering affordable housing compared to alternatives options. The SA cannot be considered to be providing an accurate assessment of the options for Policy SP3 until this issue has been properly considered.</p> <p>affordability of housing in the Borough. In such a scenario, the limited supply of homes will of course be taken by those able to afford them. This may not be newly forming households in the Borough, particularly if such potential buyers are forced to compete for limited homes with those moving out of London, who may well be moving with significant equity.</p> <p>3.40 Additionally, and more immediately, the SA's approach to this entirely fails to consider one of the key findings of the LHNA: that there are currently 3,220 households in the Borough living in unsuitable housing and are unable to afford their own housing. Additionally, this number is projected to increase to a net need for a total of 3,976 affordable homes over the period 2026-2043. Such households are inarguably part of 'the community', no matter how narrowly the Council may wish to seek to define this. Option 1 will fail the vast majority of these members of the community, significantly underdelivering affordable housing compared to alternatives options. The SA cannot be considered to be providing an accurate assessment of the options for Policy SP3 until this issue has been properly considered.</p>
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SA/SEA - 006- 005	Ceres Property for Rainer Developments		<p>SA Objective 17 and 20</p> <p>3.41 Separately, the SA's consideration of Policy SP3 in relation to Objectives 17 and 20 is also considered flawed. In each case, the justification for Option 1 being found to have positive impact, and the other options a negative impact, appears questionable at best.</p> <p>3.42 In respect of Objective 17, the appraisal overlooks the likely negative impacts on the vitality of existing settlements of failing to deliver sufficient homes to meet needs; or, conversely, the positive impacts additional housing is likely to have on existing centres.</p> <p>3.43 In respect of Objective 20, this again appears to be the case of the SA erroneously treating land beyond existing settlement boundaries as inherently remote, when that is clearly not the case.</p> <p>3.44 The SA's approach to consider the options for addressing development needs is considered fundamentally flawed, and needs to be revisited to ensure that the DLP is capable of complying with the SEA Regulations.</p>	<p>SA Objective 17 and 20</p> <p>3.41 Separately, the SA's consideration of Policy SP3 in relation to Objectives 17 and 20 is also considered flawed. In each case, the justification for Option 1 being found to have positive impact, and the other options a negative impact, appears questionable at best.</p> <p>3.42 In respect of Objective 17, the appraisal overlooks the likely negative impacts on the vitality of existing settlements of failing to deliver sufficient homes to meet needs; or, conversely, the positive impacts additional housing is likely to have on existing centres.</p> <p>3.43 In respect of Objective 20, this again appears to be the case of the SA erroneously treating land beyond existing settlement boundaries as inherently remote, when that is clearly not the case.</p> <p>3.44 The SA's approach to consider the options for addressing development needs is considered fundamentally flawed, and needs to be revisited to ensure that the DLP is capable of complying with the SEA Regulations.</p>	<p>Objective 17 is concerned with employment provision and economic growth.</p> <p>Objective 20 commentary takes a holistic view across South Essex.</p>
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SA/SEA - 006- 006	Ceres Property for Rainer Developments		<p>The SA and GB14</p> <p>3.45 The SA includes appraisal of GB14 (Site ID40101).</p> <p>3.46 The key site conclusions in respect of GB14 are set out in Table 5.2.41 and are, in full, as follows:</p> <p>“Agricultural Land Quality Grade 3: Although the site may not be wholly in current arable use, its long-term loss (due to built development) for potential agricultural use is not something that could be mitigated.</p> <p>“Within 100m of listed building - potential setting issues. Within Historic Landscape Area.</p> <p>“Ancient woodland of significant scale at southern and SE boundary, with 15m root protection area buffer extending into the site</p> <p>“Beyond walking distance from primary school and all basic health services (GP, Dentist, Pharmacy).</p> <p>“Within a Green Belt parcel meets at least one GB purpose to a 'Very Strong' extent (2018 Part 1 GB) and in 2025 a Sub-Area that meets the GB purposes to a 'Moderate/Strong' extent.</p> <p>Within Daws Heath Ring Locally Important Strategic Green Belt Area”</p> <p>3.47 It is worth reiterating that, as the judgment in Stonegate confirms, it is necessary for the SA to be based on objective evidence and to have regard to evidence that may have arisen outside of the plan-making process. In Stonegate the judgment criticised the SEA and plan for failing to integrate new, material evidence from a planning appeal regarding highways impacts, thereby</p> <p>The SA and GB14</p> <p>3.45 The SA includes appraisal of GB14 (Site ID40101).</p> <p>3.46 The key site conclusions in respect of GB14 are set out in Table 5.2.41 and are, in full, as follows:</p> <p>“Agricultural Land Quality Grade 3: Although the site may not be wholly in current arable use, its long-term loss (due to built development) for potential agricultural use is not something that could be mitigated.</p> <p>“Within 100m of listed building - potential setting issues. Within Historic Landscape Area.</p> <p>“Ancient woodland of significant scale at southern and SE boundary, with 15m root protection area buffer extending into the site</p> <p>“Beyond walking distance from primary school and all basic health services (GP, Dentist, Pharmacy).</p> <p>“Within a Green Belt parcel meets at least one GB purpose to a 'Very Strong' extent (2018 Part 1 GB) and in 2025 a Sub-Area that meets the GB purposes to a 'Moderate/Strong' extent.</p> <p>Within Daws Heath Ring Locally Important Strategic Green Belt Area”</p> <p>3.47 It is worth reiterating that, as the judgment in Stonegate confirms, it is necessary for the SA to be based on objective evidence and to have regard to evidence that may have arisen outside of the plan-making process. In Stonegate the judgment criticised the SEA and plan for failing to integrate new, material evidence from a planning appeal regarding highways impacts, thereby</p>
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				<p>breaching SEA Regulations requiring an evidence-based, objective assessment of alternatives with up-to-date information.</p> <p>3.48 The SA's consideration of GB14 suggests a similar defect in this case as that in Stonegate.</p> <p>3.49 Proposals for a residential development of GB14 / ID40101 were subject of an appeal (APP/M1520/W/23/3329585) which was dismissed on the grounds that the very special circumstances required to justify such development had not been demonstrated in the case of that specific application.</p> <p>3.50 The appeal decision confirmed a lack of any significant concerns regarding the residential development other than in terms of harm to the Green Belt.</p> <p>3.51 The appeal decision concluded the site was in a sustainable location for residential development.</p> <p>3.52 The SA Annexes report that the development of GB14 would have minor negative impacts or significant negative impacts in relation to Ancient Woodland, Local Wildlife Sites, priority habitats, TPOs, historic landscape, agricultural land quality, distance to listed buildings, archaeology, and critical drainage areas. This is despite the planning application and appeal decision having confirmed only limited harm in respect of landscape and heritage impacts; no concerns pertaining to ecology, drainage or flood risk; and, in respect of Ancient Woodland, the appeal</p>	<p>breaching SEA Regulations requiring an evidence-based, objective assessment of alternatives with up-to-date information.</p> <p>3.48 The SA's consideration of GB14 suggests a similar defect in this case as that in Stonegate.</p> <p>3.49 Proposals for a residential development of GB14 / ID40101 were subject of an appeal (APP/M1520/W/23/3329585) which was dismissed on the grounds that the very special circumstances required to justify such development had not been demonstrated in the case of that specific application.</p> <p>3.50 The appeal decision confirmed a lack of any significant concerns regarding the residential development other than in terms of harm to the Green Belt.</p> <p>3.51 The appeal decision concluded the site was in a sustainable location for residential development.</p> <p>3.52 The SA Annexes report that the development of GB14 would have minor negative impacts or significant negative impacts in relation to Ancient Woodland, Local Wildlife Sites, priority habitats, TPOs, historic landscape, agricultural land quality, distance to listed buildings, archaeology, and critical drainage areas. This is despite the planning application and appeal decision having confirmed only limited harm in respect of landscape and heritage impacts; no concerns pertaining to ecology, drainage or flood risk; and, in respect of Ancient Woodland, the appeal</p>	
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		<p>decision confirmed the proposed development was able to deliver a betterment to this. Clearly none of these factors justify rejection of the site, as the SA suggests.</p> <p>3.53 The SA opines that the site is “Agricultural Land Quality” Grade 3. However, it fails to state whether it considers the site to be Grade 3a (part of the ‘best and most versatile’ land category); Grade 3b (not considered best and most versatile). Furthermore, the SA fails to acknowledge that the site is not in agricultural use, nor explain why it could be feasibly brought back into agricultural use.</p> <p>3.54 It is also noteworthy that the SA relies on an assessment of a wider parcel in which the Site sits in terms of its contribution to the Green Belt, rather than the Site itself, i.e. characteristics of one entity (the wider area in which the Site sits) have been used to criticise another entity (the option of the Site itself). This is a further flaw in the SA.</p> <p>3.55 It should be recognised that in Stonegate it was the failure of the SEA of the plan to properly consider the latest evidence in relation to one factor (highways impacts) that had been established through a planning appeal. In the case of the DLP, it is clear that the SA fails to account for a number of factors established through an appeal, even to the point where benefit of the site’s development confirmed through the appeal have been recorded as negative effects by the SA.</p> <p>3.56 As in Stonegate, the evaluation of likely</p>	<p>decision confirmed the proposed development was able to deliver a betterment to this. Clearly none of these factors justify rejection of the site, as the SA suggests.</p> <p>3.53 The SA opines that the site is “Agricultural Land Quality” Grade 3. However, it fails to state whether it considers the site to be Grade 3a (part of the ‘best and most versatile’ land category); Grade 3b (not considered best and most versatile). Furthermore, the SA fails to acknowledge that the site is not in agricultural use, nor explain why it could be feasibly brought back into agricultural use.</p> <p>3.54 It is also noteworthy that the SA relies on an assessment of a wider parcel in which the Site sits in terms of its contribution to the Green Belt, rather than the Site itself, i.e. characteristics of one entity (the wider area in which the Site sits) have been used to criticise another entity (the option of the Site itself). This is a further flaw in the SA.</p> <p>3.55 It should be recognised that in Stonegate it was the failure of the SEA of the plan to properly consider the latest evidence in relation to one factor (highways impacts) that had been established through a planning appeal. In the case of the DLP, it is clear that the SA fails to account for a number of factors established through an appeal, even to the point where benefit of the site’s development confirmed through the appeal have been recorded as negative effects by the SA.</p> <p>3.56 As in Stonegate, the evaluation of likely</p>	
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						environmental effects by the SA lacks evidential foundation and reaches baseless conclusions, ignoring objective evidence, resulting in a totally inaccurate and unreasonable assessment of GB14. Consequently, we do not consider the DLP can be considered to meet the SEA Regulations.	environmental effects by the SA lacks evidential foundation and reaches baseless conclusions, ignoring objective evidence, resulting in a totally inaccurate and unreasonable assessment of GB14. Consequently, we do not consider the DLP can be considered to meet the SEA Regulations.	
SA/SEA - 007			Natural England			We have been unable to review this in great detail but we have the following comments and observations: We agree with the findings in 6.2.2 that there is a mix of positive and negative effects for the biodiversity objective. We note that impacts on biodiversity are highlighted as uncertain to negative for some sites and mitigation may be required to make proposals acceptable. Down-the-line project level assessments will be required to develop mitigation measures in greater detail. We note that 'Cumulative negative 'in-combination' and trans-boundary effects may stem from the potential level of growth in the Plan area and growth across Essex as a whole' (6.2.3). Please note that the Essex Coast Recreational disturbance Avoidance and	We agree with the findings in 6.2.2 that there is a mix of positive and negative effects for the biodiversity objective. We note that impacts on biodiversity are highlighted as uncertain to negative for some sites and mitigation may be required to make proposals acceptable. Down-the-line project level assessments will be required to develop mitigation measures in greater detail. We note that 'Cumulative negative 'in-combination' and trans-boundary effects may stem from the potential level of growth in the Plan area and growth across Essex as a whole' (6.2.3). Please note that the Essex Coast Recreational disturbance Avoidance and	Comments noted

						Essex as a whole' (6.2.3). Please note that the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) which is set up to account for the 'in combination' effects of new housing on coastal Habitats site is currently being reviewed and will be updated with the current findings.	Mitigation Strategy (RAMS) which is set up to account for the 'in combination' effects of new housing on coastal Habitats site is currently being reviewed and will be updated with the current findings.	
SA/SEA - 038			Rosconn Group			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 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).	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 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).	Site GB13 considered.

SA/SEA - 039	Taylor Wimpey			<p>The Sustainability Assessment is flawed in terms of the assessment of impacts of Option 4 (relating to land to north west of Thundersley), as it is subjective and overly negative on some key issues. For example, against Objective 1 it refers to 'some' constraints and 'partly' within an area for nature recovery. These do not justify a negative score, as the large area of land is generally unconstrained and more environmentally sensitive parts could be avoided or impacts mitigated. Against Objective 4, the land and has a negative score because it is grade 3 agricultural land, where as the key national test is 'Best and most versatile agricultural land', which is land in grades 1, 2 and 3a of the Agricultural Land Classification. Against Objective 10 it is stated "Although perhaps not an SA issue as such, it is difficult in practical terms to see how this site could be viably or safely accessed". This is not a valid, justified and objective view.</p> <p>Overall, the Sustainability Appraisal only concludes that "Major obstacles to option 4 appear to be access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues". Viability is not a sustainability issue, but one of delivery. Noise can be adequately mitigated through careful design, as can car dependency through</p>	<p>The Sustainability Assessment is flawed in terms of the assessment of impacts of Option 4 (relating to land to north west of Thundersley), as it is subjective and overly negative on some key issues. For example, against Objective 1 it refers to 'some' constraints and 'partly' within an area for nature recovery. These do not justify a negative score, as the large area of land is generally unconstrained and more environmentally sensitive parts could be avoided or impacts mitigated. Against Objective 4, the land and has a negative score because it is grade 3 agricultural land, where as the key national test is 'Best and most versatile agricultural land', which is land in grades 1, 2 and 3a of the Agricultural Land Classification. Against Objective 10 it is stated "Although perhaps not an SA issue as such, it is difficult in practical terms to see how this site could be viably or safely accessed". This is not a valid, justified and objective view.</p> <p>Overall, the Sustainability Appraisal only concludes that "Major obstacles to option 4 appear to be access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues". Viability is not a sustainability issue, but one of delivery. Noise can be adequately mitigated through careful design, as can car dependency through</p>	<p>Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues. North west Thundersley was also considered but not preferred for reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence.</p> <p>Option 4, Objective 1: The LNRS area covers a significant area of the site and fully bisects the site centrally on a north/south axis. It is considered important in the SA to recognise this. It is also important to note that the SA also identifies the presence of Local Wildlife Sites on site including Fane Road Meadows, North Benfleet Hall Wood and Windermere Road Wood (Marginally). The approach to agricultural land is consistent with emerging plan policy ENV6. In the absence of more detailed surveys, and in line with the precautionary principle, there will be an</p>
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				enhanced public transport – recognised in the Issues and Options document. The land to the north of Thundersley is not covered by a landscape designation and, as noted, there are only 'some' (limited) ecological issues. It is by no means clear how or why this was, therefore, categorically ruled out as a reasonable option for delivering the homes needed.	enhanced public transport – recognised in the Issues and Options document. The land to the north of Thundersley is not covered by a landscape designation and, as noted, there are only 'some' (limited) ecological issues. It is by no means clear how or why this was, therefore, categorically ruled out as a reasonable option for delivering the homes needed.	The Sustainability Appraisal is also too dismissive of government policy on meeting housing need, as it states in paragraph 28 of the non-technical summary and page 145 of the SA itself in relation to Option 3, which seeks to meet the Government's standard methodology (700 dpa): 'Option 3 has been included as an 'option' because it is the central government position, although in practical reality it doesn't represent a reasonable option since these numbers would not be remotely possible to achieve in the relatively urbanised Borough of 17 sq. miles with a prevailing low-mid density residential character, a plethora of environmental constraint and a high proportion of green belt which mostly meets at least one of the national green belt purposes to a strong degree. The overall 'significant negative' SA reflects this' As noted above, this is not the case and this requires far more granular testing, in order to meet housing needs 'in full' (NPPF para 146). The above is an example of where the assessment work	The Sustainability Appraisal is also too dismissive of government policy on meeting housing need, as it states in paragraph 28 of the non-technical summary and page 145 of the SA itself in relation to Option 3, which seeks to meet the Government's standard methodology (700 dpa): 'Option 3 has been included as an 'option' because it is the central government position, although in practical reality it doesn't represent a reasonable option since these numbers would not be remotely possible to achieve in the relatively urbanised Borough of 17 sq. miles with a prevailing low-mid density residential character, a plethora of environmental constraint and a high proportion of green belt which mostly meets at least one of the national green belt purposes to a strong degree. The overall 'significant negative' SA reflects this' As noted above, this is not the case and this requires far more granular testing, in order to meet housing needs 'in full' (NPPF para 146). The above is an example of where the assessment work	assumption that grade 3 areas should be protected from development. The NPPF is clear that areas of poorer quality land should be used instead of higher quality areas. Objective 10 also states that ' <i>Accessing via suburban areas in southerly directions would have a very detrimental effect on their prevailing suburban residential character and possibly require the loss of deciduous woodland, hedgerows, etc. In a moderate accessibility zone, which compares poorly to much of South Essex. Remote from train service. No bus routes on site, although this would be likely addressed as part of any development. On site service provision would be beneficial</i> '. The overall negative assessment is considered justified.
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					<p>on one potential large area, that could assist in meeting the standard method need, is flawed. There will be similar large areas of Green Belt land that could be released for housing if an appropriate level of testing was undertaken.</p>	<p>on one potential large area, that could assist in meeting the standard method need, is flawed. There will be similar large areas of Green Belt land that could be released for housing if an appropriate level of testing was undertaken.</p>
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SA/SEA - 040		Mark Behrendt - Home Builders Federation		Yes	<p>The legal requirements for SA are established through the Environmental Assessment of Plans and Programmes Regulations and the stated aim of identifying, describing and evaluating the likely significant effects on the environment of the plan and reasonable alternatives. In order for the Sustainability Appraisal (SA) to aid decision makers it must therefore provide, robust, balanced and evidenced based assessment of the impact of the strategy and policies in the local plan alongside consideration of reasonable alternatives to what is being proposed. HBF is concerned that the SA supporting this local plan has not achieved this and does not provide a balanced assessment as to the sustainability of the chosen strategy or the alternatives to that strategy. HBF's concerns relate primarily to the assessment of Spatial Strategy and Strategic policy SP3 and the reasonable alternatives to the proposed strategy in relation to development needs.</p> <p>The reasonable alternatives considered the SA are taken from the SA scoping report. Paragraph 4.2.2 of the SA states that in relation to SP3 has been assessed alongside option 1, 2a/b and 3 from the scoping report. Option 1 is the Council's proposed strategy with 2a proposing to release 5 green belt sites, 2b releasing 10 Green Belt sites and option three meeting standard method in full. In scoring each of these options HBF are</p>	<p>In scoring each of the SP3 options HBF are concerned that the assessment of each option as somewhat biased. Objective 12 underplays the positive impacts on poverty and deprivation of providing more homes, and in particular affordable housing, than will be delivered by the Council's proposed strategy. The same concern relates to objective 14 in term of providing appropriate housing to meet needs with the option that provides less housing, which will restrict the delivery of affordable housing being given the same score as higher growth options. HBF also has concerns with the appraisal for objective 10, which fails to properly assess the negative impact of increasing housing significant on Canvey Island and objective 18 where the impact of development on the edge of urban areas, and increasing those people accessing services in urban centres is considered to negatively impact on vitality of those centres.</p> <p>In summary the SA in its assessment of SP3 and the reasonable alternatives to that policy is not a robust assessment of the potential positive and negatives impacts to consider how the plan can contribute to the improvement not only of the environment of an area but also the social and economic conditions. It overplays the positive aspects of its own strategy and fails to recognise the significant negative social consequences arising from its decision to restrict housing growth.</p>	<p>The SA has considered reasonable alternatives in a proportionate manner. There are wider factors in relation to each SA objective. For example, objective 12 factors in that 'Development in centres most likely to contribute towards regeneration, enhance the realm and facilitate engagement and participation in community/cultural activities'. It should be noted that option 1 envisages the highest proportion of development within centres compared to the other three options.</p> <p>In relation to objective 10, housing would likely increase on Canvey progressively through options 2a, 2b and option 3. Scores are progressively more negative. The issue is given more detailed consideration in the wider raft of transport and infrastructure related evidence that supports the Local Plan.</p> <p>Objective 10 cross-references the IDP for detailed highways improvements to support the strategy. It acknowledges some uncertainty in relation to option 1 and the text acknowledges that 'Options for sustainable transport are limited and development is likely to remain largely car-dependent'. Options 2a, 2b and 3 would see progressively more development across the Borough (including in Canvey) and a</p>
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				<p>concerned that the assessment of each option as somewhat biased.</p> <p>For example, the consideration of objective 12 underplays the positive impacts on poverty and deprivation of providing more homes, and in particular affordable housing, than will be delivered by the Council's proposed strategy. Over the plan period the Council's local housing needs assessment update highlights in figure 32 that there is an overall need for 8,412 affordable homes – the equivalent of 495 homes per annum – with more pressingly 3,524 households unable to afford to buy or rent. Despite this the Council state in paragraph 9.15 of the Housing Topic Paper that the proposed strategy is expected to deliver just 86 affordable homes per annum, less than half what is required to meet those in the highest need.</p> <p>Clearly a strategy which would substantially increase housing delivery on site able to deliver more affordable housing would have a far more positive impact than the council preferred strategy. The same concern relates to objective 14 in term of providing appropriate housing to meet needs with the option that provides less housing, which will restrict the delivery of affordable housing being given the same score as higher growth options.</p> <p>HBF also has concerns with</p>	<p>progressively higher proportion of development focussed away from existing centres which are comparatively well served as public transport hubs. Objective 12 assessment positive is in the context of Plan para 13.9 noting that 1,458 new homes need to be affordable which equates to 86 affordable homes p.a. across the Plan period, or 24% of the total supply, and the Council's target is to deliver this quantum of affordable housing. In Objective 18, options 2a, 2b and 3 see progressively more development on greenfield sites and outside existing centres, which will inevitably be more car dependent and inclined to utilise out-of town retail options rather than increasingly congested town centres.</p>
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						<p>the appraisal for objective 10, which fails to properly assess the negative impact of increasing housing significant on Canvey Island and objective 18 where the impact of development on the edge of urban areas, and increasing those people accessing services in urban centres is considered to negatively impact on vitality of those centres.</p> <p>In summary the SA in its assessment of SP3 and the reasonable alternatives to that policy is not a robust assessment of the potential positive and negatives impacts to consider how the plan can contribute to the improvement not only of the environment of an area but also the social and economic conditions. It overplays the positive aspects of its own strategy and fails to recognise the significant negative social consequences arising from its decision to restrict housing growth.</p>		
SA/SEA - 036						<p>The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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</p>	<p>The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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</p>	<p>Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological</p>

						no transparent comparison of its sustainability 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 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.	no transparent comparison of its sustainability 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 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.	issues. North west Thundersley was also considered but not preferred for reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence.
SA/SEA - 037						The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 Sustainability Appraisal fails	The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 Sustainability Appraisal fails	North west Thundersley was considered but not preferred for 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. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues.

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Blake

Carolyn

carolyn.blake@uspcollege.ac.uk

SA/SEA - 027	Blake	David	carolyn.blake@uspcollege.ac.uk				The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 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 Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 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.	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues. North west Thundersley was also considered but not preferred for reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence.
SA/SEA - 028	Blake	Kiera	carolyn.blake@uspcollege.ac.uk				The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable	The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic

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SA/SEA - 035							The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 Sustainability Appraisal fails to assess North West Thundersley in any	The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 Sustainability Appraisal fails to assess North West Thundersley in any	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues. North west Thundersley was also considered but not preferred for reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence.

					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.	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.	
SA/SEA - 031	Duff	Colin	colin.duff@icloud.com		The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 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 Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 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.	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues. North west Thundersley was also considered but not preferred for reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence.

SA/SEA - 001 - 001	Organisation/Agent	Furminger	Sally	Lichfield for Taylor Wimpey	sally.furminger@lichfields.uk		Yes	SA of Policy SP3 Option 4, SA Objective 1 The Sustainability Appraisal is flawed in terms of the assessment of impacts of Option 4 (relating to land to north west of Thundersley), as it is subjective and overly negative on some key issues. For example, against Objective 1 it refers to 'some' constraints and 'partly' within an area for nature recovery. These do not justify a negative score, as the large area of land is generally unconstrained and more environmentally sensitive parts could be avoided or impacts mitigated.	SA of Policy SP3 Option 4, SA Objective 1 The Sustainability Appraisal is flawed in terms of the assessment of impacts of Option 4 (relating to land to north west of Thundersley), as it is subjective and overly negative on some key issues. For example, against Objective 1 it refers to 'some' constraints and 'partly' within an area for nature recovery. These do not justify a negative score, as the large area of land is generally unconstrained and more environmentally sensitive parts could be avoided or impacts mitigated.	Sites have been assessed consistently and objectively. The LNRS area covers a significant area of the site and fully bisects the site centrally on a north/south axis. It is considered important in the SA to recognise this. It is also important to note that the SA also identifies the presence of Local Wildlife Sites on site including Fane Road Meadows, North Benfleet Hall Wood and Windermere Road Wood (Marginally)
SA/SEA - 001 - 002	Organisation/Agent	Furminger	Sally	Lichfield for Taylor Wimpey	sally.furminger@lichfields.uk		Yes	Against Objective 4, the land and has a negative score because it is grade 3 agricultural land, where as the key national test is 'Best and most versatile agricultural land', which is land in grades 1, 2 and 3a of the Agricultural Land Classification.	Against Objective 4, the land and has a negative score because it is grade 3 agricultural land, where as the key national test is 'Best and most versatile agricultural land', which is land in grades 1, 2 and 3a of the Agricultural Land Classification.	Sites have been assessed consistently and objectively. This is consistent with emerging plan policy ENV6. In the absence of more detailed surveys, and in line with the precautionary principle, there will be an assumption that grade 3 areas should be protected from development. It is therefore a negative factor when assessing the land as a development option.
SA/SEA - 001 - 003	Organisation/Agent	Furminger	Sally	Lichfield for Taylor Wimpey	sally.furminger@lichfields.uk		Yes	Against Objective 10 it is stated "Although perhaps not an SA issue as such, it is difficult in practical terms to see how this site could be viably or safely accessed". This is not a valid, justified and objective view.	Against Objective 10 it is stated "Although perhaps not an SA issue as such, it is difficult in practical terms to see how this site could be viably or safely accessed". This is not a valid, justified and objective view.	The statement is relevant since the alternative to accessing from the dual carriageways is from southerly directions. As the SA states 'Accessing via suburban areas in southerly directions would have a very detrimental effect on their prevailing suburban residential character and possibly require the loss of deciduous woodland, hedgerows, etc.' Objective 10 also states

								'In a moderate accessibility zone, which compares poorly to much of South Essex. Remote from train service. No bus routes on site, although this would be likely addressed as part of any development' On balance negative assessment against SA objective 10 is clearly justified.	
SA/SEA - 001 - 004	Organisation/Agent	Furminger	Sally	Lichfield for Taylor Wimpey	sally.furminger@lichfields.uk	Yes	Against Objective 4, the land and has a negative score because it is grade 3 agricultural land, where as the key national test is 'Best and most versatile agricultural land', which is land in grades 1, 2 and 3a of the Agricultural Land Classification. Overall, the Sustainability Appraisal only concludes that "Major obstacles to option 4 appear to be access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues". Viability is not a sustainability issue, but one of delivery. Noise can be adequately mitigated through careful design, as can car dependency through enhanced public transport – recognised in the Issues and Options document. The land to the north of Thundersley is not covered by a landscape designation and, as noted, there are only 'some' (limited) ecological issues. It is by no means clear how or why this was, therefore, categorically ruled out as a reasonable option for delivering the homes needed. The draft Plan is not Sound,	Overall, the Sustainability Appraisal only concludes that "Major obstacles to option 4 appear to be access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues". Viability is not a sustainability issue, but one of delivery. Noise can be adequately mitigated through careful design, as can car dependency through enhanced public transport – recognised in the Issues and Options document. The land to the north of Thundersley is not covered by a landscape designation and, as noted, there are only 'some' (limited) ecological issues. It is by no means clear how or why this was, therefore, categorically ruled out as a reasonable option for delivering the homes needed.	The SA Scoping Report notes that the Local Viability Study is both one of the PPPs and a source to inform the SA of sites (Objective 14). This has therefore informed the assessment of this site on objective 14 which states ' <i>Potential to provide a significant volume of housing in this area, although wider viability issues (particularly related to access) make it questionable how much affordable housing may be achieved</i> '. <i>Regarding mitigation, the detailed commentary on each individual objective provides more detail on feasibility of mitigation. For example; objective 9 'Noise mapping shows that high noise levels are experienced across almost the entire site, not just in close proximity to the roads (as is the case in other CPBC locations). Mitigation would be necessary.'</i> <i>and Objective 4 'Seems inevitable that this would be a highly car-dependent development at this location, although the scale of the site may allow some on-site provision of services.</i> <i>Vehicle emissions are a</i>

				<p>as it is not 'positively prepared', it is not 'justified' and is not consistent with national policy. The draft Plan does not seek to deliver the minimum number of homes needed, based on the standard method, and could and should explore, at a much more granular level, options to meet the Government's standard method derived housing need.</p> <p>3.1 The preparation of the new Castle Point Local Plan must comply with the Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No.1633) ('the SEA Regulations'), which transposes the plan-making elements of European Directive 2001/42/EC ('the SEA Directive') into UK law.</p> <p>3.2 The SEA Regulations require that an Environmental Report is prepared. In this case, the Council appears to be seeking to discharge its obligation through the 'Strategic Environmental Assessment (SEA) and Sustainability Appraisal Accompanying the Regulation 19 Submission Version of the Castle Point Plan July 2025' ('the SA')</p> <p>3.3 The SA is required to identify, describe, and evaluate the likely significant effects on the environment of proposed options, as well as on reasonable alternatives (Regulation 12(2) of the SEA Regulations). Regulation 12(3) further sets out the information required to be included within the SA, referencing Schedule 2 of the SEA Regulations.</p>	<p><i>major contributory factor to climate change. Mitigation to reduce impacts could include new or enhanced active travel infrastructure and sustainable public transport to encourage a move away from the use of the private vehicle.</i></p> <p>The SA made no claim that the site was covered by a formal landscape designation and it received a minor negative, not major for SA objective 3 which noted it '<i>Would represent a major intrusion into the central corridor greenfield landscape - the area is less than 25% contiguous with the urban edge</i>' and that the impacts would be '<i>irreversible and permanent</i>'.</p>
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				<p>Schedule 2 states that SA/SEA should consider short, medium and long term effects; permanent and temporary effects; positive and negative effects; and secondary, cumulative and synergistic effects.</p> <p>3.4 As confirmed through case law (see Heard1), whilst it is not necessary to keep open all options for the same level of detailed examination at all stages, at each stage the preferred option and reasonable alternatives must be assessed to the same level of detail. This includes considering alternatives for any modifications to a plan, even if late in the plan-making process.</p> <p>3.5 To comply with the SEA Regulations, it is essential that the Sustainability Appraisal (SA) provides an accurate and balanced assessment of reasonable alternatives. This must be grounded in robust, objective, and factual evidence, rather than relying on assumptions or public opinion. This principle was affirmed in <i>Stonegate Homes Ltd v Horsham District Council</i> [2016] EWHC 2512 ('Stonegate').</p> <p>3.6 Separately, the NPPF makes clear that a sustainable appraisal that meets the relevant legal requirements should inform the preparation of a Local Plan throughout its process – the SA is relevant to the DLP's legal compliance, but also a DLP's soundness.</p> <p>1 <i>Heard v Broadland District Council</i> [2012] EWHC 344 (Admin)</p> <p>3.7 The SA explains that there were four options considered in respect of</p>	
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				<p>Policy SP3 (Meeting Development Needs).</p> <p>1. Preferred Policy: Limit new development on brownfield sites within the urban area. No Green Belt Allocations</p> <p>2a. Release a limited number of approximately 5 Green/Grey Belt sites</p> <p>2b. Release a larger number of approximately 10 larger Green Belt sites</p> <p>3. National Standard Method target which equates to 701 (686 March 2025 updated figure) per annum) over the plan period (11,662 over period 2026-2043)</p> <p>3.8 It is explained at paragraph 4.2.2 of the SA that these four options derived from the SA Scoping Report.</p> <p>3.9 It is understood that the SA Scoping Report predates the publication of the 2024 National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guidance (PPG), which clarify how Local Planning Authorities must calculate local housing need and emphasise that such figures represent the minimum number of homes to be planned for. It is unclear why the reasonable alternatives assessed in the SA have not been updated to reflect these national policy requirements. For the Draft Local Plan (DLP) to be found sound, it must, among other things, be consistent with national policy. Accordingly, the assessment of reasonable alternatives should have been revised to ensure it reflects the actual options available within the context of a Local Plan that is required to meet housing needs in full.</p> <p>3.10 Worryingly, there is a</p>	
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				<p>lack of acknowledgement of the severity of the Borough's affordable housing shortage, or the issue regarding the affordability of housing in the area in respect of the SA's appraisal of Policy SP3 is the.</p> <p>3.11 The Castle Point Local Housing Needs Assessment Update (2025) ('the LHNA Update') estimates there are currently 3,220 households in the Borough living in unsuitable housing and are unable to afford their own housing; and projects a net need for a total of 3,976 affordable homes over the period 2026-2043. This equates to 234 affordable dwelling per annum (dpa).</p> <p>3.12 In addition, there are clear inadequacies in the way the Sustainability Appraisal (SA) has assessed the options for Policy SP3, particularly in relation to several specific SA objectives.</p> <p>3.13 Objective 1 concerns both the protection and enhancement of biodiversity. The SA considers, in short, that the greater housing growth options, the more negative the impact in relation to this objective. The accompanying commentary in relation to Policy SP3 and this objective seems to be based on the view that higher growth options would inevitably entail development of areas that of ecological value. However, the evidence as to how much housing development could be delivered without loss of ecologically valuable areas is unclear.</p> <p>3.14 Development is required to be accompanied by biodiversity net gain (BNG). In crude terms, the</p>	
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more development the more BNG would be delivered. The SA appears dismissive of this, stating that “habitats and species may take decades or more to become established and reach a stage of ecological maturity (500 years in the case of ancient woodland).” However, there is nothing to suggest that higher growth options would necessitate loss of Ancient Woodland or that only Ancient Woodland would provide the necessary BNG. This overarching attitude appears to tarnish high growth options, without understanding the reality and deliverability of higher growth options.

3.15 Objective 10 concerns reduction of the need to travel by private car and promotion of sustainable forms of transport. Option 1 is the only one that is appraised as not having a negative impact on this objective; with Option 2a assessed as ‘minor negative’ and Options 2b and 3 as ‘significant negative’.

3.16 In seeking to justify this, the commentary states that “Green Belt development would exacerbate the car-dependency issue as these would be less well served by bus services and more remote from existing services. Development focused on existing centres may help facilitate this objective, by locating residents close by existing services and existing sustainable transport options”. However, this presupposes that Green Belt sites are inherently remote and impossible to be served by public transport. However, this is not the

case. The Green Belt boundary is drawn tightly around existing built-up areas of the Borough's settlements, and thus includes land that is in proximity to facilities and services, and capable of being served by public transport. It also fails to consider that the low growth option (Option 1) has the potential to increase the need for travel by private car, for example forcing members of the community and employees of local businesses to meet their accommodation needs outside of the Borough, increasing the need to commute by car.

3.17 In respect of SA Objective 11 ("improve the quality, range, and accessibility to essential services, facilities, green infrastructure and open space") Option 1 is assessed as having a 'minor positive' / 'minor negative' impact, whereas the other options in which more homes are provided, including through Green Belt development) are assessed as having a negative.

3.18 For instance, the SA commentary appears to assume that any development within the Green Belt would inherently result in housing located far from accessible services. However, this is evidently inaccurate, as there are numerous Green Belt sites that are well-connected and in close proximity to a range of facilities and services.

3.19 The SA commentary further states that "Development focused on existing centres may help facilitate this objective for

most services.” However, this appears to rest on a flawed assumption that development within existing centres and on selected Green Belt sites are mutually exclusive options. In reality, both forms of development could be pursued concurrently. Moreover, the commentary overlooks the limited capacity of existing centres to accommodate the scale of housing needed.

3.20 The commentary also states “there are pre-existing open space deficits that will be difficult to fully address, e.g. six wards in the Borough have no access to youth play space” and that “contributions to address this will be competing with a limited pot that also serves wider needs, e.g. health, education, affordable housing, etc”. This commentary only supports seeking to achieve the minimum housing requirement, rather than the much lower figure proposed by the DLP, in order to help facilitate provision of additional youth play space, and ensure greater contributions to additional public open space. It is important to recognise that much of the Borough’s Green Belt is not publicly accessible and currently has no recreational value. The SA commentary fails to acknowledge that development of Green Belt does not need to / nor would it predominantly entail the loss of public open space, but is, in fact, more likely to increase such provision.

3.21 The appraisal of the options against SA Objective 11 is fundamentally flawed.

3.22 Turning to SA Objective

12, the approach to appraisal of the options is one of the most problematic elements of the SA. This SA objective is “To reduce poverty, deprivation and social exclusion”.

3.23 The SA commentary notes “Development in centres most likely to contribute towards regeneration, enhance the realm and facilitate engagement and participation in community/cultural activities”; and also “new housing development may help some on to the housing ladder and help address social exclusion to some extent”.

3.24 The SA appraisal assesses each option as having the same impact (‘minor positive’ / ‘possibility of either positive or negative impacts, or general uncertainty’). This is an obviously unfeasible position for the SA to adopt, for several reasons.

3.25 The SA fails to properly recognise the importance of ensuring people have access to appropriate, affordable, housing. Below provides a summary of just some of the issues that are caused by a lack of sufficient accommodation, that we suggest should be considered in an update to the SA (the list is not exhaustive):
Homelessness. As of 31 March 2024, the Government reported that 117,450 households were living in temporary accommodation—an increase of 12.3% from the previous year. Shelter estimates that 354,016 people were homeless in

				<p>England on any given night in 2024. Alarmingly, many individuals have remained in temporary accommodation for over a decade².</p> <ul style="list-style-type: none"> • Overcrowding. In 2023, the National Housing Federation found that 3.4 million people in England were living in overcrowded conditions. In 41% of these households, children or teenagers were forced to share a bedroom with adults. The same report revealed that 77% of families in overcrowded homes experienced negative impacts on their mental health, while 56% of children faced adverse health outcomes. • Housing suitability. A 2023 study³ identified over 240,000 households across England experiencing the most severe forms of homelessness, including rough sleeping and prolonged stays in unsuitable temporary accommodation such as nightly paid B&Bs. • Health impacts. Research⁴ shows that 73% of individuals on social housing waiting lists reported living in accommodation that was detrimental to their health. Additionally, 62% said their housing conditions were negatively affecting their mental well-being. • Increased pressure on welfare. The housing shortage places significant financial strain on public services, with increased government spending required for temporary accommodation and to address related health and 	
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				<p>social issues.</p> <ul style="list-style-type: none"> • Unaffordable housing. The persistent undersupply of homes has led to a sharp decline in affordability. The ratio of average house prices to average earnings has risen dramatically, making home ownership increasingly unattainable for many. • Education and development. Children living in unstable or substandard housing often face educational disadvantages, including disrupted schooling, poor study environments, fatigue, higher absence rates⁵. • Delayed independence and postponement of family planning. The unaffordability of housing has contributed to an increase in the average age at which people buy their first home – 34 as of 2022/23⁶. • Economic impact. The lack of housing impairs labour mobility, which impacts on the formation of new businesses and the retention of existing ones due to resultant recruitment issues. The <p>2 Commons Library Research Briefing: Households in temporary accommodation. Published Monday, 30 January 2023</p> <p>3 Herriot Watt University and Crisis (2023) The Homelessness Monitor: England 2023</p> <p>4 Crisis, Lloyds Banking Group and Simon Community Northern Ireland The 'A – Z' of issues caused by the social housing shortage. Published 17 September 2024</p> <p>5 Cebr (2024) The economic</p>	
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							impact of building social housing: A Cebr report for Shelter and the National Housing Federation 6 DLUHC Housing history and future housing. Published 14 December 2023 increased cost of housing as a result of a lack of supply also has negative impacts in terms of people having less disposable income, limiting local economic activity and growth. • Public services recruitment. Research produced by Centre for Cities noted that the NHS, police, and schools have all experienced difficulties in recruiting that have been linked to unaffordability of housing within certain areas. 3.26 The above+I10+I15		
SA/SEA - 001 - 005	Organisation/Agent	Furminger	Sally	Lichfield for Taylor Wimpey		Yes	The Sustainability Assessment is also too dismissive of government policy on meeting housing need, as it states in paragraph 28 of the non-technical summary and page 145 of the SA itself in relation to Option 3, which seeks to meet the Government's standard methodology (700 dpa): 'Option 3 has been included as an 'option' because it is the central government position, although in practical reality it doesn't represent a reasonable option since these numbers would not be remotely possible to achieve in the relatively urbanised Borough of 17 sq. miles with a prevailing low-mid density residential character, a	The Sustainability Assessment is also too dismissive of government policy on meeting housing need, as it states in paragraph 28 of the non-technical summary and page 145 of the SA itself in relation to Option 3, which seeks to meet the Government's standard methodology (700 dpa): 'Option 3 has been included as an 'option' because it is the central government position, although in practical reality it doesn't represent a reasonable option since these numbers would not be remotely possible to achieve in the relatively urbanised Borough of 17 sq. miles with a prevailing low-mid density residential character, a	Noted. The National Standard Method figure is fully assessed against all twenty SA objectives on pages 126 to 146 in Section 4.3 of the main SA Report.

						plethora of environmental constraint and a high proportion of green belt which mostly meets at least one of the national green belt purposes to a strong degree. The overall 'significant negative' SA reflects this' As noted above, this is not the case and this requires far more granular testing, in order to meet housing needs 'in full' (NPPF para 146). The above is an example of where the assessment work on one potential large area, that could assist in meeting the standard method need, is flawed. There will be similar large areas of Green Belt land that could be released for housing if an appropriate level of testing was undertaken.	plethora of environmental constraint and a high proportion of green belt which mostly meets at least one of the national green belt purposes to a strong degree. The overall 'significant negative' SA reflects this' As noted above, this is not the case and this requires far more granular testing, in order to meet housing needs 'in full' (NPPF para 146).	
SA/SEA - 008	Ganer	Neal				The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 performance, nor a clear justification for its exclusion. This omission undermines the credibility of the appraisal and raises legitimate questions about whether all reasonable	The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 performance, nor a clear justification for its exclusion. This omission undermines the credibility of the appraisal and raises legitimate questions about whether all reasonable	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues. North west Thundersley was also considered but not preferred for reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence.

						alternatives have been properly considered. 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.	alternatives have been properly considered. 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.	
SA/SEA - 017						The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 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 Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 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.	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues. North west Thundersley was also considered but not preferred for reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence.

Gosnold

Andrew

gozza@icloud.com

SA/SEA - 024	Harris	Rebecca	rebecca.harris.mp@parliament.uk	The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 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 Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 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.	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues. North west Thundersley was also considered but not preferred for reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence.
SA/SEA - 022	Houser	Anita	anitahouser@hotmail.co.uk	The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable	The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic

						<p>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 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 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.</p>	<p>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 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 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.</p>	<p>and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues. North west Thundersley was also considered but not preferred for reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence.</p>
SA/SEA - 020	Keeble	Gina		keebles.2007@btinternet.com		<p>The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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</p>	<p>The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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</p>	<p>Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues. North west Thundersley</p>

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SA/SEA - 015						The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 Sustainability Appraisal fails to assess North West Thundersley in any	The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 Sustainability Appraisal fails to assess North West Thundersley in any	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues. North west Thundersley was also considered but not preferred for reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence.

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SA/SEA - 023					<p>The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 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.</p>	<p>The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 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.</p>	<p>Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues. North west Thundersley was also considered but not preferred for reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence.</p>

Marshall

Reece

hjh42w@gmail.com

SA/SEA - 013	Mckenzie	Samuel	samuel.mckenzie@gmail.com	The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 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 Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 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.	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues. North west Thundersley was also considered but not preferred for reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence.
SA/SEA - 029	Norton	Linda	lindafoot@msn.com	The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable	The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic

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SA/SEA - 014						<p>The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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</p>	<p>The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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</p>	<p>Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues. North west Thundersley was also considered but not preferred for reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence.</p>

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SA/SEA - 011						The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 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 Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 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.	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues. North west Thundersley was also considered but not preferred for reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence.

SA/SEA - 009	Robbins	James					<p>The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 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.</p>	<p>The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 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.</p>	<p>Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues. North west Thundersley was also considered but not preferred for reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence.</p>
SA/SEA - 025							<p>The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable</p>	<p>The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable</p>	<p>Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic</p>

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SA/SEA - 012						<p>The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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</p>	<p>The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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</p>	<p>Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues. North west Thundersley</p>

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SA/SEA - 030							The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 Sustainability Appraisal fails to assess North West Thundersley in any	The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 Sustainability Appraisal fails to assess North West Thundersley in any	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues. North west Thundersley was also considered but not preferred for reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence.

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SA/SEA - 016	Stockton	Michael	micksolkhon@gmail.com		The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 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 Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 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.	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues. North west Thundersley was also considered but not preferred for reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence.

SA/SEA - 004	CODE Development Planners Ltd for Rosconn Group	Yes	<p>A sustainability appraisal (SA) prepared in support of a local plan “needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted” (PPG, paragraph 018, Reference ID: 11-018-20140306).</p> <p>The PPG states that, “Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.”</p> <p>In doing so, it is important to outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (as required by Regulation 5 of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)).</p> <p>The SA must also provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach considering the alternatives. This approach is consistent with the requirements of the SEA Regulations.</p>	<p>A sustainability appraisal (SA) prepared in support of a local plan “needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted” (PPG, paragraph 018, Reference ID: 11-018-20140306).</p> <p>The PPG states that, “Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.”</p> <p>In doing so, it is important to outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (as required by Regulation 5 of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)).</p> <p>The SA must also provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach considering the alternatives. This approach is consistent with the requirements of the SEA Regulations.</p>	<p>Reasonable alternatives have been considered. Section 4 of the SA is ‘The Assessment of the Plan Policies, Strategy Reasonable Alternative Options’</p> <p>As stated, ‘This SA assesses each chapter, including all policies and relevant supporting text and reasoned justification, as well as alternative approaches where deemed ‘reasonable’ i.e. realistic and distinctly different from the preferred approach.’ ‘Assessment options and conclusions have evolved since the Scoping Report due to several factors, such as emerging evidence and factors of consideration, the emergence of wider comparisons, as well as detailed site-based analysis revealing more detail regarding constraints, etc.’</p> <p>‘The assessment of reasonable alternative option sites (Section 5) was an assessment of all reasonable alternative sites. These were assessed predominantly against mathematically measurable indicators (e.g. distances and overlap with planning constraints). There were generally several indicators for each of the twenty objectives, ensuring a very thorough assessment.’</p> <p>As set out in section 3.1.2, the SA methodology implicitly aligns with the Planning Practice</p>
Organisation/Agent	Thatcher	Daniel	daniel@rosconngroup.com	Yes	

				<p>A key purpose of the SA is "...to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives."</p> <p>The SA is not sufficiently clear regarding the selection of reasonable alternatives for consideration, and nor is it transparent regarding the selection of preferred options (or reasons why other options were discounted from consideration. In particular, CODE is concerned regarding the lack of consideration of further reasonable alternatives identified by other evidence base documents to be suitable for further consideration and analysis.</p> <p>There is also little justification or consideration of the preferred approach within the SA (ie preference for brownfield development only over considering any Green Belt release), and no explanation of why this approach has been selected over other alternatives.</p> <p>CODE therefore considers the SA prepared in support of the emerging local plan to be unsound, and not legally compliant. The lack of consideration of other sustainable reasonable alternatives in Thundersley (and across the wider borough on Green Belt sites), including the smaller area of site GB13 identified within the Green Belt Assessment</p>	<p>A key purpose of the SA is "...to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives."</p> <p>The SA is not sufficiently clear regarding the selection of reasonable alternatives for consideration, and nor is it transparent regarding the selection of preferred options (or reasons why other options were discounted from consideration. In particular, CODE is concerned regarding the lack of consideration of further reasonable alternatives identified by other evidence base documents to be suitable for further consideration and analysis.</p> <p>There is also little justification or consideration of the preferred approach within the SA (ie preference for brownfield development only over considering any Green Belt release), and no explanation of why this approach has been selected over other alternatives.</p> <p>CODE therefore considers the SA prepared in support of the emerging local plan to be unsound, and not legally compliant. The lack of consideration of other sustainable reasonable alternatives in Thundersley (and across the wider borough on Green Belt sites), including the smaller area of site GB13 identified within the Green Belt Assessment</p>	<p>Guidance. Reasonable alternatives are the realistic options explored by the when shaping the policies within a plan that are both realistic and deliverable. Where relevant, alternatives for policy directions have been assessed and documented alongside each appraisal, including the rationale for their rejection or non-progression.</p> <p>Section 5 'The Assessment of Option Sites' sets out that the section 'explores the sustainability of all sites submitted for allocation, or otherwise considered a reasonable option for allocation.' Section 5 also highlights the close relationship and cross-reference to other plan evidence, particularly the SLAA 'sieving' out sites for consideration as allocations within the Plan, with further exploration within this SA. Annex A of the SA sets out detailed assessment of development option sites highlighting the relevant strengths and weaknesses against the 20 SA objectives which has contributed towards site selection.</p>
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				<p>(July 2025) to potentially meet the definition of Grey Belt, is in direct conflict with Regulation 5 of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).</p> <p>To rectify the soundness concerns raised, CPBC should update the SA to include all suitable reasonable alternatives, including the smaller area of GB13. Furthermore, the approaches to development across the borough should be considered in more detail. SA is supposed to be an iterative process. However, it has long been clear that CPBC was intending to pursue an approach which limited Green Belt release, even before the revisions to the NPPF in December 2024. Indeed, in a press release on 10 April 2025, CPBC stated, “When we withdrew the previous plan in 2022, we were clear on the priorities for the new Castle Point Plan. It was to be based on a genuinely assessed local housing need; it would prioritise brownfield and urban sites; and it would protect the Green Belt.”</p> <p>Paragraph 018, reference ID: 11-018-20140306 is clear that “The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the findings.” It cannot be said in the case of the Castle Point Plan that this approach has been followed. It is clear that the preferred approach has been predetermined long before the first consultation</p>	<p>(July 2025) to potentially meet the definition of Grey Belt, is in direct conflict with Regulation 5 of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).</p> <p>To rectify the soundness concerns raised, CPBC should update the SA to include all suitable reasonable alternatives, including the smaller area of GB13. Furthermore, the approaches to development across the borough should be considered in more detail. SA is supposed to be an iterative process. However, it has long been clear that CPBC was intending to pursue an approach which limited Green Belt release, even before the revisions to the NPPF in December 2024. Indeed, in a press release on 10 April 2025, CPBC stated, “When we withdrew the previous plan in 2022, we were clear on the priorities for the new Castle Point Plan. It was to be based on a genuinely assessed local housing need; it would prioritise brownfield and urban sites; and it would protect the Green Belt.”</p> <p>Paragraph 018, reference ID: 11-018-20140306 is clear that “The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the findings.” It cannot be said in the case of the Castle Point Plan that this approach has been followed. It is clear that the preferred approach has been predetermined long before the first consultation</p>
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						on the Castle Point Plan. The plan is therefore not legally compliant, and the SA is not in accordance with the relevant provisions of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).	on the Castle Point Plan. The plan is therefore not legally compliant, and the SA is not in accordance with the relevant provisions of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).	
SA/SEA - 021	Thirpthorpe	Keri		k71ppy@yahoo.co.uk		The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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	The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues. North west Thundersley

						comparison of its sustainability 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 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.	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 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.	was also considered but not preferred for reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence.
SA/SEA - 032						The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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	The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues. North west Thundersley was also considered but not preferred for reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence.

						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.	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.	
SA/SEA - 033						The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 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 Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 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.	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues. North west Thundersley was also considered but not preferred for reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence.

Watson

Rosalyn

rosalyn.ashford79@gmail.com

SA/SEA - 018	Watts	Samantha	colinandsam86@gmail.com	The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 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 Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been 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 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 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 Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues. North west Thundersley was also considered but not preferred for reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence.
SA/SEA - 019	Wright	Carly	carly26@googlemail.com	The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable	The Sustainability Appraisal, which underpins the Plan's spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable	The Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. The option is 'Create a substantial new development area in NW of Thundersley' and it is considered against all 20 objectives of the SA framework including environmental, economic

				<p>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 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 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.</p>	<p>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 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 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.</p>	<p>and social criteria. Major obstacles are identified including access (both viability of new and impact on character from current), noise, car-dependency, landscape/green-belt, pattern of development and some ecological issues. North west Thundersley was also considered but not preferred for reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence.</p>
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