



**Statement of Common Ground**

**Castle Point Plan 2026 to 2043**

**Regulation 19 Draft**

Between

Castle Point Borough Council  
and  
Historic England

November 2025

## **1. Introduction**

1.1 This Statement of Common Ground (SoCG) has been prepared jointly by Castle Point Borough Council (CPBC) and Historic England (HE) in relation to the Castle Point Local Plan (known as the Castle Point Plan).

1.2 The purpose of this SoCG is to set out the areas of agreement and any outstanding matters between the parties, in accordance with the requirements of the National Planning Policy Framework (NPPF, paragraph 28) and the Planning Practice Guidance.

1.3 CPBC has fully engaged with HE on the development of the Castle Point Plan from the outset with regards its role as statutory consultee.

1.4 In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, HE has been formally consulted at Regulation 18 and 19 stages of consultation together with its accompanying Sustainability Appraisal/Strategic Environmental Assessment.

1.5 This SoCG identifies the matters on which CPBC and HE are agreed, as well as any areas where differences remain.

## 2. Areas of Agreement (Common Ground)

2.1 HE submitted representations to the Castle Point Plan during the Regulation 19 Draft Consultation (August to September 2025) and confirmed their position during the further consultation (October to December 2025).

2.2 The entries in the table below set out the agreed modifications to the Castle Point Plan, which resolve all HE's representations. All modifications in this SoCG are also included in the Council's Modifications Schedule.

Rep Number	Policy/Paragraph Reference	Summary of representation/comment from Historic England	Agreed response and Modifications
0333	Paragraph 10.2	<i>We welcome the numerous references to the historic environment within this chapter, particularly the reference to the Grade I listed Church of St James the Less and Hadleigh Castle. However, to ensure clarity and consistency, we recommend amending paragraph 10.2 to explicitly state that Hadleigh Castle is both a Scheduled Monument and a listed building, as is already done for the Church of St James the Less. This clarification will help readers fully appreciate the significance of both heritage assets'</i>	<p><u>Modification as follows (bold text additions, strike through deletions).</u></p> <p>10.2 Hadleigh Castle (<b>a Scheduled Monument and Grade 1 listed</b>) sits to the south of the town centre and dates to Saxon times. Whilst it is in a ruined state, it is the centrepiece of the Hadleigh Castle Country Park, a major tourist attraction within the Borough which was home to the 2012 Olympic Mountain Biking events.</p>
0333	Policy Had1 - Hadleigh Town Centre	We welcome the commitment to preparing a new Hadleigh Town Centre Master Plan, particularly criterion 7, which aims to create	Support noted.

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		<p>an appropriate setting for heritage assets, including the Grade I listed Church of St James the Less. As set out in our Good Practice Advice Note 3 (The Setting of Heritage Assets), the setting of a heritage asset can contribute to its significance, as well as to the ability to appreciate that significance. We therefore welcome the focus on public realm improvements that will help sustain and enhance the significance of heritage assets within the town centre by focusing on those aspects of their setting which make a positive contribution to their significance.</p>	
0333	Policy Had2 – Hadleigh Country Park, Hadleigh Farm and Benfleet and Southend Marshes	<p>We welcome the supporting text at paragraph 10.20, which acknowledges the site's visual prominence and its role in forming the setting of Hadleigh Castle. However, to ensure this consideration carries appropriate weight in decision making, we recommend that it be incorporated into Policy Had2 as a new criterion. This would give the issue greater prominence and strengthen the protection of the castle's setting and, in turn, its overall significance.</p>	<p><u>Modification as follows (<b>bold</b> text additions, <del>strike</del> through deletions):</u></p> <p><b>1.</b> Within the area as identified on the Policies Map, the Council will support the following land uses and proposals for development:</p> <p class="list-item-l1"><b>a.</b> Proposals related to the improvement of recreational facilities within the Country Park and maintenance of the Country Park where they do not have a significant impact on <b>Hadleigh</b></p>

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			<p><b>Castle or its setting, the landscape, environmental assets or the Green Belt, and comply with the requirements of policy ENV4 and other relevant policies of this Plan;</b></p> <p><b>b.</b> 2. Proposals related to the development and/or use of the farm for agricultural and/or training purposes in line with the charitable mission of the landowner, where they do not have a significant impact on <b>Hadleigh Castle or its setting, the landscape, environmental assets or the Green Belt, and comply with the requirements of policy ENV4 and other relevant policies of this Plan;</b> or</p> <p><b>c.</b> 3. Proposals for habitat creation and habitat management and mitigation which are complementary to the habitats which already exist on or near the site, with specific regard to the Southend and Benfleet Marshes SPA and Ramsar site.</p> <p><b>2.</b> 4. Development proposals must be designed to enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).</p>

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			<p><b>3.5.</b>Development proposals must ensure areas that are identified as an Area of Particular Importance for Biodiversity (APIBs) within the Essex Local Nature Recovery Strategy (LNRS) are protected and where possible enhanced.</p>
0333	Policy DH1 – Green space Connectivity in Daws Heath	<p>We welcome criterion 1, which acknowledges the historic pattern of irregular small fields and ancient woodland. These features make a valuable contribution to the area's historic environment and sense of place. We therefore particularly support the requirement for this landscape character to be protected and enhanced.</p>	<p>Support noted.</p>
0333	Policy D9 – Conserving and Enhancing the Historic Environment	<p>We welcome the comprehensive approach taken in Policy D9 to the conservation and enhancement of the historic environment. The policy provides a clear framework for the consideration of both designated and non-designated heritage assets, and we are pleased to see reference to key</p>	<p><u>Modification to Policy D9 as follows (<b>bold</b> text additions, strike through deletions):</u></p> <p>2. Reference <b>shall</b> be made to the South Benfleet Conservation Area Management Plan and the Florence Gardens Conservation Area Management Plan, as relevant, when determining planning applications in these areas. The South Benfleet Conservation Area Design Code <del>should</del> <b>must</b> be applied when preparing</p>

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		<p>supporting documents and management plans.</p> <p>While we consider the policy to be sound, we recommend that the wording is reviewed to replace terms such as “should” with “shall” or “must” where appropriate. This would help to reinforce the requirements and expectations for applicants and decision makers.</p> <p>For ease of access, we also suggest that hyperlinks to the relevant documents (such as the South Benfleet Conservation Area Management Plan, Florence Gardens Conservation Area Management Plan, and the South Benfleet Conservation Area Design Code) are included in the online version of the Plan.</p>	<p>and assessing proposals within the South Benfleet Conservation Area.</p> <p>3. Regard <b>should</b> <b>shall</b> be had to the Historic Environment Record in determining if archaeological remains are present within a proposed development site. Where remains are present, the Council will have regard to the archaeological importance of those remains, the need for the development, the likely extent of any harm, and the likelihood of the proposal successfully preserving the archaeological interest of the site when considering proposals effects on archaeology.</p> <p><b><u>Further Mods: Additional Hyperlinks</u></b> Add hyperlinks to the following references on the online version of the Plan:</p> <p>Policy D9 part 2 and paragraph 16.72 ‘South Benfleet Conservation Management Area’, ‘South Benfleet Conservation Area Design Code’ ‘Florence Gardens Conservation Area Management Plan’</p> <p>Para 16.75 and 16.76 <a href="#">Essex County Council’s Essex Historic Environment Record (EHER) database</a></p>

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0333	Appendix H	<p>Finally, we recommend including a caveat to clarify that the lists of heritage assets appended to the Plan (Appendix H) are subject to change over time, for example as new non-designated heritage assets are identified or as designations are updated. This will ensure that the Plan remains flexible and up to date as further information becomes available.</p>	<p>Modification to Appendix H as follows (<b>bold</b> text additions, strike through deletions):</p> <p>The tables below <del>identifies</del> <b>identify</b> the designated and non-designated heritage assets as set out in Policy D9 <b>as of July 2025. Note that this list may change over time as new non-designated heritage assets are identified or as designations are updated.</b></p>

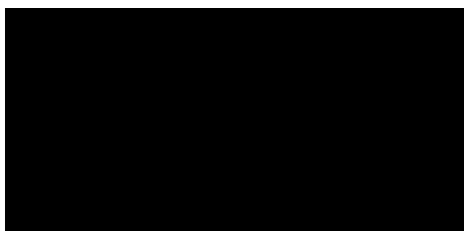
### **3. Areas Without Agreement (Uncommon Ground)**

3.1 There are no areas without agreement.

### **4. Ongoing Cooperation**

4.1 CPBC will continue to work with Historic England in their role as a statutory consultee for plan-making and planning applications. HE's expert advice may be sought in relation to specific sites or assets.

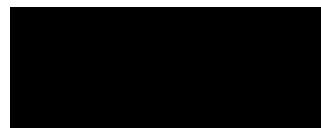
## Signatories



For and on behalf of Castle Point Borough Council:

**Name and Position:** Amanda Parrott, Assistant Director, Climate and Growth

**Date:** 25 November 2025



For and on behalf of Historic England:

**Name and Position:** Andrew Marsh, Historic Environment Planning Adviser, East of England Region.

**Date:** 17<sup>th</sup> November 2025