

Schedule of Responses to the Issues Discussion Paper

Question IDP1: Do you agree with the Strengths identified for Castle Point?

ID	Name	Organisation	Yes/No	Comments
ISSDP9	Ms Sandra Glen		Yes	
ISSDP10	Mr Andrew Parrott		Yes	Very nicely pointed out, perhaps more people should be made aware of all these features more often
ISSDP15	Mr Paul Harbord		Yes	These strengths are exactly the reasons I move to Benfleet
ISSDP25	Mr K Taylor		Yes	I broadly agree, but question the assessment of SEEVIC college, as I believe that it's performance has fallen, particularly in academic subjects (see performance table attached. Note 2010 points increase reflects addition of A* scoring).
ISSDP33	Mrs Julie Juniper		Yes	
ISSDP35	Elaine De Can	Canvey Island Town Council	Yes	
ISSDP61	Mr & Mrs Hughes		Yes	I broadly agree but think that Canvey beach areas are not well maintained and the conservation lake, surroundings and some adjoining paths and roads have been allowed to become a dumping ground for huge amounts of rubbish. Also due I think to the high business rates on Canvey this has meant that small individual shops cannot be viable.
ISSDP66	Mr John Hall			Add road infrastructure with good connection to M25 and by A130 to A12. University might be worth a mention and easy access to Universities in Southend and eventually Basildon. Weather might be worth mentioning with some of driest in country yet no particular potable water problems.
ISSDP71	Miss Jo Hardwick	Environment Agency	Yes	We are pleased that the discussion paper recognises the unique natural environment within the Borough including a Special Protection Area, recommend Marine Conservation Zone, several Sites of Special Scientific Interest and numerous local wildlife sites. Importantly it is also recognised there are several areas of marshland. In particular the salt-marshes of Essex are one of the least modified habitats in a densely populated county and account for a tenth of the national resource. They provide many important functions including fish nurseries and bird feeding grounds as well as recreation and flood defence. We also agree that the Borough proximity to the River Thames provides numerous recreational opportunities.
ISSDP96		Barratt Homes	No	Whilst we recognise that the presence of the Green Belt designation has been successful in maintaining the separation and openness between settlements within the Borough, and in this respect, is considered a 'strength' by CPBC, we also consider that it has had a negative effect within the Borough. In this regard, the tightly drawn boundaries of Green Belt designation around the existing settlements has placed a significant strain on the 'non' Green Belt locations within the Borough to accommodate development and growth. As a result, these areas have now become overly congested resulting in, and exacerbating, existing infrastructure issues within the Borough and reducing the quality of life in these locations. We do not therefore consider the simplistic presence of Green Belt as an overarching 'strength'.
ISSDP109	Felstead Road	Redrow Homes	Yes	Yes, the consultation has identified the key strengths with regard to Castlepoint. The Borough is well connected with easy access by rail to London in only 35 minutes. It also benefits from good connections between Benfleet to Southend on Sea to the east and Basildon to the west. In particular land at Felstead Road, Benfleet, is situated in a sustainable location, being well connected to the local transport system. It is located directly adjacent to Kent's Hill Road, which is a major bus route and provides direct access to Benfleet train station just over a mile away to the south. To the north Kents hill Road bus route provides direct access to Basildon, which is only 4 miles to the west and Southend, which is 7 miles to the east. Benfleet, as the largest mainland settlement in Castlepoint benefits from being well served by a number of services and facilities. Land at Felstead Road is located to the north of the town centre, and is located in close proximity to a number of services and facilities. The site is directly adjacent to Holy Family Catholic Primary School and Kents Hill Road Infants School. It is also in close proximity to Appleton Secondary School, which is only 100 metres away to the west. The site is very well served by local schools. The site also benefits from being located in close proximity to a number of services and shops on London Road within a short walking distance to the north. This includes a veterinary centre, osteopaths,

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				<p>car garage, car wash, Indian Restaurant, newsagents, sandwich bar, a Chinese restaurant and a number of other shops. Therefore if a development did come forward on Felstead Road, the new residents would have a good access to local schools, services and bus routes making this a very sustainable site for development.</p> <p>The Council has correctly identified that the greenbelt has been successful in containing urban sprawl in the Borough, and has prevented individual towns in Castlepoint from merging with one another. When assessing the potential for release of land from the greenbelt it is important that preference is given to the release of sites, which are well contained and will not result in coalescence with other towns. Land at Felstead Road is unusual for a greenbelt site, in that its release of land for housing would not have any impact upon the wider greenbelt. The site benefits from being very well contained with housing to its north and south boundary and the two schools to its west boundary. It is also partially enclosed by larger low density housing to the east. Whilst the site is designated as 'greenbelt' it is affectively within the urban framework and is one of only a few greenbelt sites in Benfleet that would not result in coalescence with Hadleigh to the east or Hope's Green to the west.</p>
ISSDP118	East of Central Avenue	Redrow Homes	Yes	<p>Yes, the consultation has identified the key strengths with regard to Castlepoint. The Borough is well connected with easy access by rail to London in only 35 minutes. It also benefits from good connections between the main settlements in Castlepoint (including Hadleigh) to Southend-on-Sea to the east, and Basildon to the west. Hadleigh in particular benefits from very good road and public transport links, being home to the central bus depot, which provides regular services to Southend and Basildon. The bus depot is situated within walking distance of land to the east of Central Avenue. Central Avenue is also served by bus route, which is directly opposite Central Avenue on Daws Heath Road to the west of the site.</p> <p>Hadleigh benefits from being served by a number of services. Land to the east of Central Avenue is situated adjacent to an existing residential area and only a short distance from the main services and schools in Hadleigh Town to the south.</p> <p>The Council has correctly identified that the Green Belt has contained urban sprawl in the Borough, and has prevented individual towns in Castlepoint from merging with one another. When assessing the potential release of land from the greenbelt it is important that the Council gives preference to the release of sites, which are well contained and will not result in coalescence with other towns. Land to the east of Central Avenue is the prime example of an area of greenbelt land, which is well contained, in that it will not result in an impact upon the wider greenbelt. Furthermore being situated to the north- east of Hadleigh it is well separated from the other settlements in the Borough and will not result in coalescence.</p>
ISSDP127	Mr Richard Reeves		Yes	<p>Yes, the consultation has identified the key strengths with regard to Castlepoint. The Borough is well connected with easy access by rail to London in only 35 minutes. It also benefits from good connections between the main settlements in Castlepoint (including South Benfleet) to Southend-on-Sea to the east, and Basildon to the west. South Benfleet in particular benefits from very good road and public transport links, with Benfleet train station being less than a mile away and bus stops that are less than half a mile from the site providing access to Canvey Island and Southend-On-Sea.</p> <p>South Benfleet benefits from being served by a number of services with the Essex Way surgery less than half a mile from the site. Land to the south of Essex Way is adjacent to an existing residential area and less than a mile from the nearest primary school and a number of shops on Essex Way. South Benfleet is one mile from the site with Benfleet centre being just less than three miles.</p> <p>The Council has correctly identified that the Green Belt has contained urban sprawl in the Borough, and has prevented individual towns in Castlepoint from merging with one another. When assessing the potential release of land from the greenbelt it is important that the Council gives preference to the release of sites, which are well contained and will not result in coalescence with other towns. Land to the south of Essex Way is the prime example of an area of greenbelt land, which is well contained, in that it will not result in an impact upon the wider greenbelt and is surrounded to the north, west and south by residential properties. It will not result in the coalescence of any built up areas and as figure 1 illustrated does not extended to the fringes of the existing development that surrounds the site.</p>
ISSDP153	Jamie Melvin	NATURAL ENGLAND		<p>The importance of the unique natural environment in Castle Point is appropriately recognised in the section on "strengths", including the opportunities this provides for the economy and recreation.</p> <p>The analysis of strengths appropriately recognises most of the important designations within or partly within Castle Point District. However the Benfleet and Southend Marshes Ramsar site has not been considered. Please include reference to this within the first bullet point.</p>
ISSDP182	Mr Alex Cooper	RSPB	Yes	Yes, we particularly welcome the recognition that Castle Point has a unique natural environment, which includes its Special Protection Areas (SPA)'s, SSSI's and Local Wildlife Sites. We also welcome the recognition that the RSPB is a landowner in the area.
ISSDP209		Oikos Storage Limited	No	Oikos is surprised to note that the District Council evidently believes the area has no economic strengths, or at least none worth mentioning. As outlined below, Oikos suspects that the Council paints an unnecessarily gloomy picture.
ISSDP215		Petroplus Refining and Marketing Limited (Petroplus)	Yes	<p>Petroplus supports the strengths identified in Paragraph 2.1. In particular, Petroplus agrees that Castle Point "has a unique natural environment" which includes Holehaven Creek and Canvey Wick, two Sites of Special Scientific Interest (SSSIs) located to the west of Canvey Island. The ecological importance of Holehaven Creek and Canvey Wick SSSIs should be recognised and these sites should continue to be protected in the <i>New Local Plan</i> from any future development.</p> <p>Green Belt</p>

ID	Name	Organisation	Yes/No	Comments
				<p>Petroplus supports the recognition of the Green Belt as a strength of Castle Point. The Coryton Refinery is located in close proximity to the Green Belt (see Appendix 1). The Green Belt has proved successful in preventing urban sprawl in the borough and from preventing development close to the refinery.</p> <p>As consistently stated in representations to the emerging Castle Point Borough Council Core Strategy, Petroplus continues to strongly object to the intensification of development in the Green Belt surrounding the Coryton Refinery Complex. Petroplus believes that developing in the Green Belt is bad planning and an ineffective strategy to adopt. Petroplus has stated this in previous representations in May 2007, September 2007, August 2008, March 2009, January 2010 and at the Castle Point Core Strategy Examination in Public in May 2010.</p> <p>We have reviewed the Castle Point Green Belt Function Assessment 2010 and the Castle Point Green Belt Character Assessment 2010 and have the following comments:</p> <p>Green Belt 'Parcel 23' The Castle Point Green Belt Function Assessment 2010 and the Castle Point Green Belt Character Assessment 2010 highlight the importance of the Green Belt to the west of Canvey Island. The Castle Point Green Belt Function Assessment 2010 states that Green Belt 'Parcel 23' (see Appendix 2), located on the south west of Canvey island, fulfils a strategic role in the Green Belt at a subregional level and allows for access of countryside amenity and enjoyment for local residents. The Castle Point Green Belt Character Assessment 2010 states that at Green Belt 'Parcel 23', there are very substantial constraints on development due to very high landscape and high visual sensitivity, the Coastal Protection Belt and County Wildlife Site designations and its status as an RSPB reserve. Green Belt 'Parcel 23' prevents development encroaching from urban area of Canvey Island towards the refinery.</p> <p>Green Belt 'Parcel 27' The Castle Point Green Belt Function Assessment 2010 states that 'Parcel 27' (see Appendix 3), comprising East Haven and Hole Haven Creeks, at the strategic level, is part of a wider system that encircles and demarks the boundary of Canvey's urban settlement. It also allows for access for countryside amenity and enjoyment for local residents. The Castle Point Green Belt Character Assessment 2010 states that 'Parcel 27' has substantial constraints due to high landscape sensitivity, designations of SSSI and Coastal Protection Belt. It states that 'Parcel 27' is not physically suitable for development. Green Belt 'Parcel 27' is located adjacent to the refinery and prevents development close to the refinery.</p> <p>Green Belt 'Parcel 28' The Castle Point Green Belt Function Assessment 2010 states that 'Parcel 28' (see Appendix 4), which is situated within the south west corner of Canvey Island, to the north of Parcel 27 and south of Parcel 23 is also part of a wider system that encircles and demarks the boundary of Canvey's urban settlement and also allows for access for countryside amenity and enjoyment for local residents. It also makes up an even larger Green Belt area which serves to link the south western extent of the borough with Green Belt within the neighbouring Thurrock administrative areas. Green Belt 'Parcel 28' prevents urban sprawl in the borough and prevents development close to the refinery.</p> <p>The Castle Point Green Belt Character Assessment 2010 states that in this parcel, there are medium landscape and visual sensitivities and that most of the site is a SSSI. The whole site is within the Coastal Protection Belt and there are constraints to development on most of the site.</p> <p>Overall, the Castle Point Green Belt Function Assessment 2010 and the Castle Point Green Belt Character Assessment 2010 highlight the importance of these Green Belt parcels in restricting urban sprawl and safeguarding encroachment between west Canvey and Thurrock as well as their ecological, visual and landscape sensitivities which constrain any development.</p> <p>Petroplus would encourage the Council to continue to recognise the importance of the Green Belt, particularly Green Belt land located in the west and south west of Canvey Island and ensure that development is permitted only in very '<i>exceptional circumstances</i>' as stated in PPG2 'Green Belts' (Para. 2.6). Furthermore, development should not occur within the Coryton Refinery Complex's additional buffer zone, marked by an 'x-x' line (see Appendix 5). Petroplus welcomes the inclusion and recognition of this 'x-x line' on page 14 of the <i>New Local Plan Issues Discussion Paper</i>.</p>

Question IDP2: Are there any other Strengths of Castle Point that are not identified?

ID	Name	Organisation	Yes/No	Comments
ISSDP34	Patrick Walker		Yes	The location especially Canvey Island and its beach areas should be further developed to increase tourist and day trippers generating further income and employment opportunities for the borough.
ISSDP36	Elaine De Can	Canvey Island Town Council	Yes	A more in depth explanation of the historical assets should be listed in the New Plan
ISSDP72	Miss Jo Hardwick	Environment Agency	Yes	The Benfleet and Southend Marshes are also a designated RAMSAR site which should be recognised in the Plan.
ISSDP136	Mr Roy Lewis	Essex County Council	Yes	The following should be added to the list of strengths, <ul style="list-style-type: none"> Benfleet station is well integrated into the transport network with one of the highest usage bus-rail interchanges in Essex and also with good cycle facilities that attract a high number of people to cycle to the station. The Borough is situated in Thames Gateway South Essex which is part of the Thames Gateway Growth Area, a national priority area for investment to promote regeneration and growth, and is also identified as a priority within the South East Local Enterprise Partnership (SELEP) and in the Greater Essex Integrated County Strategy (ICS).
ISSDP161	GMPF	Thameside Metropolitan Borough Council	Yes	GMPF agrees with the strengths identified for the Borough. However, GMPF is a key investor in Canvey Town Centre, and the Knightswick Centre is the town centre's largest single retail asset. This is recognised throughout the Council's Retail Needs Assessment Study (2007). The ' <i>strengths</i> ' section in Chapter 2 acknowledges the ' <i>local shopping parades</i> ' as a strength but fails to acknowledge Canvey Town Centre or in particular, the role the Knightswick Centre plays within it. The Knightswick Centre accommodates a range of national multiples, including Sainsbury's, Peacocks, M&Co and ShoeZone. Agent information indicates that only 8 units are currently vacant in the Centre, and GMPF is close to agreeing a lease with a national retailer on the largest vacant unit. This demonstrates that the Centre is trading reasonably well given the current economic climate. The Centre, including Sainsbury's, a key anchor, and the large adjoining surface car park, provide a modern accessible retail offer in the town centre. GMPF requests that the Council recognises that this is a strength of the town centre.
ISSDP183	Mr Alex Cooper	RSPB	No	
ISSDP210		Oikos Storage Limited	Yes	The list of strengths should take a more positive and strategic view. One of the District's key economic strengths is that it occupies a strategically important location on the north bank of the lower Thames. Astride both national oil pipeline networks, and with deep-water access, it is a nationally important location for the fuel imports on which the national economy depends. The District Council's attention is drawn to both the thrust and the detail of paragraphs 18- 22 of NPPF, under the sub-heading 'Building a strong, competitive economy'. The Council will see there, amongst other exhortations, a requirement that 'local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21 st century' and 'identify priority areas for ... infrastructure ... provision'.

Question 1DP3: Do you agree with the weaknesses identified for Castle Point?

ID	Name	Organisation	Yes/No	Comment
ISSDP1	Dr Robert Spink		Yes	Insufficient weight has been put on the restrictions placed on commuting from Castle point by train (capacity needs increasing at peak times and costs need to be reduced) and road,(the problem of congestion can not be overstated both for Canvey and the mainland. Improving Saddlers Farm will mostly help traffic going north since the single land A13 across the borough will continue to cause unacceptable hold-ups)
ISSDP12	Mr Alan Diplock		Yes	We need to look at the possibility of another exit road from Canvey Island across to Corringham/Stanford Le-Hope as proposed in the past. If more houses are built on Thorney Bay Caravan park, this will add to the 'already too congested' Canvey Way at peak times.
ISSDP14	Mr R.N. Simmons		Yes	A lot of Shops in Canvey are Charity Shops or shops are closing down - Your Business rates must be high for these shops to close - Make Canvey a delight to shop and encourage more shops to compete with Basildon and Southend.
ISSDP16	Mr Paul Harbord		Yes	Investment in the redevelopment of the Focus store at Tarpots into a new shopping centre for Benfleet would benefit local businesses as well as local residents and potentially attract people from outside the area to visit.

ID	Name	Organisation	Yes/No	Comment
ISSDP18	Mr Glenn Phillips		Yes	Limited land supply to build new buildings is not necessarily a weakness.
ISSDP20	Mr Paul Moore		Yes	Public Transport provisions are not adequate at any time, not just evenings. The congestion in the area demonstrates this (people are in private vehicles only as no real viable, and affordable options are available), Improving highways is great but will only encourage further private vehicle use until viable public transport alternatives are provided. A policy change is needed for this, simply put making public transport clean, affordable, regular and reliable gets people out of cars and encourages businesses to invest and improves a sense of community.
ISSDP26	Mr K Taylor		Yes	Business rates and transport access are critical issues for Canvey Island. It could easily attract shoppers from the mainland if they could get on and off the Island. Commuting delays at transport choke points affect the whole Borough, but are particularly serious for Canvey.
ISSDP28	Mr Graham Cornwell		Yes	Long may the open land prevent the "Urban Sprawl" and kept away from developers. It is a redeeming feature of Castle Point. Over the years a variety of good shops in Benfleet have disappeared to be replaced by a proliferation of Hairdressers, Chinese, Indian & Fast Food Takeaways. The shops in Benfleet High Road are in need of rejuvenation. The block of shops opposite St Mary's Church have become an eyesore and are completely out of character with the nearby conservation area.
ISSDP37	Elaine De Can	Canvey Island Town Council	Yes	
ISSDP67	Mr John Hall			No particular town identity or look or community ownership, it is just a place! Poor town planning is gobbling up green space within heart of urban areas changing character of place to just another dormitory town, with diminishing amenities and higher build density. Poor thinking on how much parking space is needed means parked cars litter the streets.
ISSDP73	Miss Jo Hardwick	Environment Agency	Yes	No environmental weaknesses have been identified. It should be noted that improvements to the environment may help address some of the social and economic issues identified.
ISSDP97		Barratt Homes		Due to the reasons set out above, we consider that the Green Belt designation should also appear in the 'Weakness' section of the SWOT analysis. It should be noted that we do not object to the principle of Green Belt within the Borough, but seek that CPBC recognise that its presence, along with other issues such as flood risk, has resulted in difficulties in providing sufficient housing to meet the identified needs and unless identified at this early stage for review, will only continue to negatively impact on other objectives of the spatial strategy in the future. We support the identification that there is a limited land supply to accommodate new development as set out in the 'weakness' section.
ISSDP110	Felstead Road	Redrow Homes	Yes	Yes, the consultation has identified most of the key weaknesses within Castlepoint. In particular the limited land supply is one of the key weaknesses affecting Castlepoint and needs to be addressed as part of the new Local Plan. Growth over the last 50 years has focused on greenbelt protection and utilising previously developed land, and as a result there is an insufficient supply of previously developed land available for development in the Borough. The draft Core Strategy for Castlepoint was withdrawn in 2011 after the Planning Inspectorate clearly set out the need for the Council to release land for development from the greenbelt. Development in the greenbelt is urgently required to increase the level of land to be delivered for development within the Borough and to provide much needed housing and economic growth. Under the Planning and Compulsory Purchase Act (2004) all local planning authorities are required to maintain a continuous 5 year supply of land to meet their housing growth targets. The Strategic Housing Land Availability Assessment (SHLAA) update (2011) identifies that Castlepoint do not currently have a 5 year land supply. Perhaps the most critical point within the SHLAA, is that Castlepoint do not have an adequate supply of housing on existing brownfield sites to meet the requirements for the Borough over the plan period (2011-2026). The SHLAA sets out that Castlepoint has a requirement to identify a minimum of 3,450 dwellings to come forward for housing over the next 15 years. However, this does not account for the uplift in housing identified in the draft National Planning Policy Framework (NPPF). The NPPF sets out the following in paragraph 109: 'The supply should include an additional allowance of at least 20% to ensure choice and competition in the market for land.' Based on the housing requirement identified in the SHLAA to meet the requirements of the NPPF Castlepoint need to make provision for an allocation of a minimum of 4140 dwellings to come forward over the next 15 years. The SHLAA has identified that only 407 dwellings are deliverable on brownfield land over the next 5 years, with only 2028 dwellings deliverable on brownfield land over the plan period (2011- 2026). On this basis and taking account of the 20% uplift in the NPPF, a minimum of 2,112 dwellings need to be

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				<p>delivered over the plan period on greenbelt land. Of this, a minimum of 973 dwellings need to be identified on greenbelt land to come forward within the next 5 years.</p> <p>The release of greenbelt land for development will not only have the effect of meeting the Councils identified shortfall of housing supply, it also provides a number of other benefits for the Borough. For example one of the significant identified problems within Benfleet and Castlepoint as a whole is the lack of affordable housing. The release of land from the greenbelt would provide provision for affordable housing for local people in accordance with adopted planning policies. In addition to this Section 106 and/or Community Infrastructure Levy funding from greenbelt developments would provide much needed funding and investment to the local infrastructure and services in Castlepoint. The Council has identified a lack of investment in public open spaces, congestion on the roads and the need for the upgrading of health and leisure facilities as key weaknesses in Benfleet. The release of suitable greenbelt sites would provide significant funding to address some of these key issues.</p>
ISSDP119	East of Central Avenue	Redrow Homes		<p>Yes, the consultation has identified most of the main weaknesses within Castlepoint. The Council has correctly identified the limited land supply as one of the key weaknesses affecting Castlepoint. Growth in the last 50 years has centred on greenbelt protection and utilising previously developed land, and as a result there is an insufficient supply previously developed land available for development.</p> <p>The draft Core Strategy for Castlepoint was withdrawn in 2011, after the Planning Inspectorate clearly set out the need for the Council to release greenbelt land for development and increase the level of land to be delivered for development in the Borough.</p> <p>Under the Planning and Compulsory Purchase Act (2004) all planning authorities are required to maintain a continuous 5 year supply of land to meet their housing growth targets. The Strategic Housing Land Availability Assessment (SHLAA) update (2011) identifies that Castlepoint do not have a 5 year land supply. As a critical point within the SHLAA Castlepoint do not have an adequate housing supply on existing brownfield sites to meet the requirements for the Borough over the new local plan period (2011-2026). The SHLAA sets out that Castlepoint has a requirement to identify a minimum of 3,450 dwellings to come forward for housing over the next 15 years. In addition to this the draft National Planning Policy Framework sets out the following:</p> <p>'The supply should include an additional allowance of at least 20% to ensure choice and competition in the market for land'</p> <p>Taking this into consideration, in reality Castlepoint will need to make provision for allocation of a minimum of 4140 dwellings as part of the New Local Plan. The SHLAA has identified that only 407 dwellings are deliverable on brownfield land over the next 5 years, with only 2028 dwellings deliverable on brownfield land over the plan period (2011-2026). On this basis, taking into account the 20% uplift in the NPPF a minimum of 2,112 dwellings need to be delivered over the plan period on greenbelt land. Of this, a minimum of 973 dwellings need to be identified on greenbelt land to come forward within the next 5 years.</p> <p>There are a number of benefits to releasing an appropriate level of greenbelt land for development. This includes being able to deliver affordable housing in accordance with adopted planning policies to meet the identified need. This is particularly an issue in Hadleigh where house prices are considerably higher than local wages. In addition Section 106 contributions or the Community Infrastructure Levy will also provide much needed investment in local infrastructure and services. This include provision of improving existing public open spaces in Castlepoint, funding for the upgrading of GP surgeries and provision of infrastructure improvements to tackle peak time congestion. Therefore the release of greenbelt land will not only tackle the limited land supply within Castlepoint, but it will also provide funding for much needed facilities and infrastructure improvements to address other identified weaknesses in the Borough.</p> <p>Land to the east of Central Avenue is greenbelt site that has been identified as suitable for housing within the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA also identifies that the site is well enclosed and will not materially impact upon the strategic function of the greenbelt. Access to the site can be achieved from Central Avenue. Redrow Homes are committed to bringing forward a scheme, which respects the character and ecology of the SSSI Woodland to the east of the site. As shown on conceptual masterplan-01 (drawing number CMP-P1-01) the proposals will provide a landscape buffer on the east boundary adjacent to Dodd Grove woodland.</p> <p>The scheme also includes provision for the creation of an area of public open space to the north of the site, for existing and local residents. The applicants are also keen to incorporate the provision of two eco- plots, which will be exemplar in terms of sustainable design, as shown on the conceptual masterplan.</p>
ISSDP128	Mr Richard Reeves		Yes	<p>Yes, the consultation has identified most of the main weaknesses within Castlepoint. The Council has correctly identified the limited land supply as one of the key weaknesses affecting Castlepoint. Growth in the last 50 years has centred on greenbelt protection and utilising previously developed land, and as a result there is an insufficient supply previously developed land available for development.</p> <p>The draft Core Strategy for Castlepoint was withdrawn in 2011, after the Planning Inspectorate clearly set out the need for the Council to release greenbelt land for development and increase the level of land to be delivered for development in the Borough.</p> <p>Under the Planning and Compulsory Purchase Act (2004) all planning authorities are required to maintain a continuous 5 year supply of land to meet their housing growth targets. The Strategic Housing Land Availability Assessment (SHLAA) update (2011) identifies that Castlepoint do not have a 5 year land supply. As a critical point within the SHLAA Castlepoint do not have an adequate housing supply on existing brownfield sites to meet the requirements for the Borough over the new local plan period (2011-2026). The SHLAA sets out that Castlepoint has a requirement to identify a minimum of 3,450 dwellings to come forward for housing over the next 15 years. In addition to this the draft National</p>

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				<p>Planning Policy Framework sets out the following:</p> <p>'The supply should include an additional allowance of at least 20% to ensure choice and competition in the market for land'.</p> <p>Taking this into consideration, in reality Castlepoint will need to make provision for allocation of a minimum of 4140 dwellings as part of the New Local Plan. The SHLAA has identified that only 407 dwellings are deliverable on brownfield land over the next 5 years, with only 2028 dwellings deliverable on brownfield land over the plan period (2011-2026). On this basis, taking into account the 20% uplift in the NPPF a minimum of 2,112 dwellings need to be delivered over the plan period on greenbelt land. Of this, a minimum of 973 dwellings need to be identified on greenbelt land to come forward within the next 5 years.</p> <p>There are a number of benefits to releasing an appropriate level of greenbelt land for development. This includes being able to deliver affordable housing in accordance with adopted planning policies to meet the identified need. In addition Section 106 contributions or the Community Infrastructure Levy will also provide much needed investment in local infrastructure and services. This include provision of improving existing public open spaces in Castlepoint, funding for the upgrading of GP surgeries and provision of infrastructure improvements to tackle peak time congestion. Therefore the release of greenbelt land will not only tackle the limited land supply within Castlepoint, but it will also provide funding for much needed facilities and infrastructure improvements to address other identified weaknesses in the Borough.</p> <p>Land to the south of Essex Way is a greenbelt site that has been identified as suitable, for housing within the Strategic Housing Land Availability Assessment (SHLAA) in the short term. It is considered that this site would accommodate approximately 31 units, which would assist in contributing towards the immediate 5 year housing land supply required. Landscaping has been highlighted as sensitive within the SHLAA; however there is an existing hedge to the east of the site, which would be retained as part of any development and provides a natural development edge.</p>
ISSDP154	Jamie Melvin	NATURAL ENGLAND		<p>Since the publication of the New Local Plan Issues Discussion Paper, the Greater Thames Marshes has now been announced as a Nature Improvement Area. This covers almost 490 square kilometres of estuarine and marshland habitats on both the Essex and Kent sides of the Thames. The money available will bring opportunities to enhance existing wildlife sites, improve ecological connectivity and/or create new sites, bringing valuable benefits.</p> <p>DEFRA expects local authorities to use the local planning process to support delivery of enhancements within Nature Improvement Areas, including identifying them in their local plans. DEFRA also advises that, when planning for development in their areas, local authorities may want to specify the types of development that may or may not be appropriate in component parts of Nature Improvement Areas (such as existing designated areas). They may also want to provide a 'steer' on design aspects and how development can contribute to the Nature Improvement Area objectives.</p> <p>As the New Local Plan is in an early phase of development now is a good time to incorporate objectives and actions associated with the Nature Improvement Area.</p>
ISSDP170	Mr Andrew Dutton	Persimmon Homes		<p>I do not disagree with the strengths/weaknesses identified at pages 4-6 of the Discussion Paper. However, given the content of Table 10 of the Annual Monitoring Report 2010/11, a substantive weakness is the failure of the Council to deliver an acceptable number of affordable homes in the period 2001-2011.</p> <p>Page 12 of the AMR states that " <i>the delivery of affordable housing in Castle Point has been relatively poor during the period 2001 to 2011. Only 71 affordable homes have been delivered in total during this period, none of which were delivered during the reporting period. This is primarily due to the small size of housing development sites in Castle Point.</i>" This lamentable performance is a direct consequence of one of the weaknesses described at page 6 of the Discussion Paper, namely that there is a limited land supply made available to accommodate new development in the Borough, the urban area being tightly bound by the presence of the Green Belt which prevents expansion of the urban area to enable housing to be delivered in locations which could address the affordability concerns.</p>
ISSDP184	Mr Alex Cooper	RSPB	Yes	
ISSDP216		Petroplus Refining and Marketing Limited (Petroplus)		<p>Petroplus acknowledge that there is a limited supply of land to accommodate new development and that the urban area is tightly bound by the Green Belt, preventing expansion of the urban area. However, Petroplus re-iterate the importance of protecting the Green Belt from encroachment by development.</p> <p>The Green Belt is invaluable in preventing urban sprawl and in preventing the individual towns in Castle Point from merging with one another, or with towns outside Castle Point. This is proven in the Castle Point Green Belt Function Assessment 2010.</p>
ISSDP218	Mr Ivor Beamon	FLP Ltd		<ul style="list-style-type: none"> • The limited supply of land within Castle Point has created a chronic shortfall in housing. • The Council are unable to demonstrate a 5 year supply. • To address the housing shortfall a review of existing Green Belt boundaries is required in order to identify sufficient housing land. • Future housing targets should be treated as a minimum. • The successful delivery of housing during the Local Plan period is fundamental to the effective implementation of the Local Plan. • National Planning Policy Framework (NPPF) and Planning Policy Statement 3 ' <i>Housing</i> ' (PPS3) encourages Local Authority's to develop policies and implementation strategies to ensure that sufficient, suitable land is available to achieve their housing delivery objectives.

ID	Name	Organisation	Yes/No	Comment
				<ul style="list-style-type: none"> Insufficient regard has been taken of a large proportion of the Borough is situated in Flood Zone 3 There has been no mention as to the recent growth has been wholly focused on Canvey Island where the distribution across the Borough has led to a limited supply of homes within the Mainland areas of the District Although the presence of the hazardous installations on the existing population has been identified as a Threat there is no cross-referencing as a potential weakness in providing a deliverable housing supply should the moratorium on Green Belt releases from the mainland prevail in the New Local Plan. <p>Justification attached</p>

Question IDP4: Are there any other Weaknesses of Castle Point that are not identified?

ID	Name	Organisation	Yes/No	Comment
ISSDP2	Dr Robert Spink		Yes	The lack of affordable housing, especially on the mainland, is a greater problem than is acknowledged resulting in the age range in the borough getting older and this is affecting the vibrance of the borough's economy and employment prospects. There are not the young people with the drive and ability to build new businesses and therefore create employment in the Borough so the Borough will become even more simply a dormitory town.
ISSDP21	Mr Paul Moore		Yes	The current trend for developing sites into multi dwelling properties (flats, apartments in the London road in Benfleet for multiple examples), only adds to the congestion and parking issues. In addition increasing the borough's population increases demand and pressure on all local amenities (private and public). The council must ensure that all local amenities are improved and invested in (a compulsory financial donation from developers would go some way to ensure the public services are invested in as the number of users of these services increases)
ISSDP27	Mr K Taylor		Yes	Closure of local police stations, and reductions in police presence, coupled with difficulties relating to transport infrastructure, reduces the sense of well-being within the community, and may have a negative impact on inward investment.
ISSDP38	Elaine De Can	Canvey Island Town Council	No	
ISSDP62	Mr & Mrs Hughes		Yes	I agree with the above comments but do not think that Canvey can support more housing as the roads are already too congested.
ISSDP74	Miss Jo Hardwick	Environment Agency	Yes	Due to the topography of Canvey Island its community is very vulnerable to flood risk, particularly if the flood defences were to breach. The number of caravans and single storey units on the island further increase the vulnerability of the population which should be acknowledged as a weakness. Further there is no published evacuation plan for the island.
ISSDP103	Rose Freeman	The Theatres Trust		Castle Point is one of the few local authority areas not to have a dedicated theatre. The primary purpose of 'cultural facilities' is to enlighten and entertain the public through the production, presentation, exhibition, advancement and preservation of art, music, theatre and dance. Support of culture is increasingly seen as an investment in an area's present and future quality of life. There is now a general growing awareness of the role that the arts and culture can play in developing an educated workforce and, on the other hand, in attracting an educated workforce to the Borough. Please include existing and future cultural facilities.
ISSDP137	Mr Roy Lewis	Essex County Council	Yes	The following should be included in the list of weaknesses, In terms of transport provision there is a lack of cycling facilities in the borough.
ISSDP227	Clive Simpson	Basildon Borough Council	Yes	There is recognised sub-regional shortage of authorised sites for Gypsy and Travellers, evidenced by count figures showing there to be 185 unauthorised caravans being present in the authorities neighbouring Castle Point ¹ . Basildon Borough Council considers that the Issues Discussion Paper should identify this as a sub-regional 'weakness', which the Castle Point New Local Plan can contribute to tackling in the future. [1] Source: Count of Gypsy and Traveller Caravans 28 th July 2011
ISSDP185	Mr Alex Cooper	RSPB	Yes	Yes, we would also add that existing infrastructure for cycling and walking is inadequate and this should be recognised in the report.

¹ Source: DCLG Count of Gypsy and Traveller Caravans 28th July 2011

ID	Name	Organisation	Yes/No	Comment
ISSDP207		Jetbury Investments Ltd	Yes	<p>We support the recognition that <i>'there is limited land supply to accommodate new development in Castle Point. The existing urban area has mainly developed over the last 50 years, and as a result there is very little vacant or derelict previously developed land available to redevelopment. The urban area is tightly bound by the Green Belt preventing expansion of the urban area'</i> .</p> <p>The Discussion Paper also recognises that <i>'within Castle Point there is an issue with affordable housing'</i>, which is also welcome.</p> <p>The final NPPF was published on 27 March 2012. Paragraph 47 identifies the steps that local authorities should take to <i>'boost significantly the supply of housing'</i>. The NPPF retains the requirement to identify a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements (paragraph 47). An additional buffer of 5% is required and where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20%. Councils should also make provision for years 6-10 and 11-15.</p> <p>The EiP Inspector for the withdrawn Core Strategy had doubts as to whether the Council has a five year supply of housing. In a letter dated 11th May 2011 the Inspector states:</p> <p><i>'I have concerns with three elements which underpin the spatial strategy. These are firstly, the approach in relation to the Green Belt; secondly the consequences on the distribution of growth across Borough and thirdly, the Council's ability to demonstrate it can deliver sufficient housing land over the plan period.</i></p> <p><i>While the Council purports to have provided sufficient land to meet on-going needs over 5, 10 and 15 years, I find the supporting evidence to be weak.'</i></p> <p>The Inspector suggested that one way forward might be to reconsider the sites put forward on potential housing sites with a view to identifying land on the mainland capable of early release from the Green Belt. The Inspector recommends that further land equivalent to about 2 ½ years would appear to be sensible.</p> <p>The Inspector who dismissed the Barratt appeal at Land at Kiln Road in May last year shared this view and stated (paragraph 8) that <i>'the evidence points to a supply that is appreciably less than five years'</i>.</p> <p>It is therefore crucial that the Discussion Paper also identifies housing need and housing supply as an issue / weakness which needs addressing within the borough.</p> <p>In relation to the Council's statement in the Discussion Paper that there is limited land supply to accommodate new development in Castle Point, for the reasons set out below (in respect of Thundersley) this does not accurately reflect the position and is therefore misleading. We agree with the Core Strategy Inspector that the Council needs to revisit its assessment of Green Belt locations. It is our view that there is land within the Green Belt that does not serve the five purposes of the Green Belt as set out in the NPPF and should therefore be released. For example, land at Kiln Road, adjacent to the land safeguarded for housing in the adopted Local Plan.</p>

Question IDP5: Do you agree with the Opportunities identified for Castle Point?

ID	Name	Organisation	Yes/No	Comment
ISSDP39	Elaine De Can	Canvey Island Town Council	Yes	
ISSDP63	Mr & Mrs Hughes		Yes	I do agree broadly with the above strengths but think that too much money has been wasted in the past with little or no benefit to the community i.e the regeneration shop in the Knightswick centre, tinkering with the lake area etc.
ISSDP75	Miss Jo Hardwick	Environment Agency	Yes	We are pleased that you have identified the Thames Gateway South Essex green infrastructure projects as an opportunity.
ISSDP111	Felstead Road	Redrow Homes	Yes	Yes, the consultation correctly identifies the Castlepoint Regeneration Partnership as an opportunity to bring investment and regeneration to Benfleet as the largest and key mainland settlement in Castlepoint. It also sets out that Essex County Council are providing much needed investment to schools in the area. The release of suitable greenbelt sites for development in Benfleet, such as land at Felstead Road would assist in providing funding for required facilities in Benfleet, including funding of new school facilities.
ISSDP120	East of Central Avenue	Redrow Homes	Yes	Yes, the consultation correctly identifies the Castlepoint Regeneration Partnership and the London 2012 Olympic Mountain Biking Event as an opportunity to give investment and regeneration in Hadleigh Town Centre. The release of greenbelt land for housing in Hadleigh, such as land to the east of Central Avenue would assist in providing infrastructure and services funding for Hadleigh town centre.
ISSDP129	Mr Richard		Yes	Yes, the opportunities identified provide a positive and proactive overview of the potential that Castle Point has to become a better place to live, work and run a business.

ID	Name	Organisation	Yes/No	Comment
	Reeves			
ISSDP186	Mr Alex Cooper	RSPB	Yes	
ISSDP219	Mr Ivor Beamon	FLP Ltd		<ul style="list-style-type: none"> The Council need to be realistic in identifying opportunities for Castle Point. Funding is an issue that is likely to compromise the delivery of further improvements to Roscommon Way. There is no identified funding source for the project. The availability of public and private sector funding is constrained in the current economic climate. The regeneration of Canvey Island and Hadleigh town centres is also likely to be limited when compared to masterplans that have previously been prepared and remain undeliverable. Any revised proposals coming forward need to focus on supporting local needs and services. The regeneration schemes should not seek to meet Borough wide need. <p>Justification attached</p>

Question IDP6: Are there any other Opportunities for Castle Point that are not identified?

ID	Name	Organisation	Yes/No	Comment
ISSDP17	Mr Paul Harbord		Yes	The Manor Trading Estate is a mess and needs redeveloping to provide new opportunities for businesses and investors, The Focus store also needs redevelopment to provide more shops at Tarpots.
ISSDP22	Mr Paul Moore		Yes	As the paper recognises the ageing population, the borough should encourage these citizens with their vast life experience and availability of time to contribute to the local community in as many ways as possible. Ensuring that this sector of the demographic are included and catered for is imperative in all community areas. Too many of our older people feel excluded and unimportant, improving public services and recognising the value this demographic have on our society is the single most important thing for a continually ageing population.
ISSDP24	Mr Kevin Foley		Yes	<p>SWOT analysis tends to focus on single specific items instead of grouping these together and by doing so we can see how a strength can outweigh a weakness or threat.</p> <p>For example Castle point has Hadleigh Castle, the Country Park and the Olympic mountain bike circuit, plus a few commercial leisure activates around golf, fishing lakes and such like in the same area - South Benfleet referred to as Green Belt in the discussion documents.</p> <p>By looking at that whole area and taking a single coordinated focused approach you can easily see the massive opportunities these existing facilities offer and expand to a whole range of other outdoor activities. Create a 'park' where people will want to bring their families to enjoy the outdoor facilities available. Think of Centre Parcs, that's what I'm talking about. Horse riding, water based leisure activities, different forms of all terrain pursuits e.g. moto cross, rock climbing etc.</p> <p>If the current land owners / council agreed to form an alliance they could lease the land for such a 'park' bringing not only job creation, improved income for individuals and the community, younger people living in the borough, but growth across the whole borough that the influx of people brings.</p>
ISSDP32	Mr Kevin Foley		Yes	<p>Re Centre Parcs comment.</p> <p>See I told you so! This is what Castle Point needs.</p> <p>http://www.bbc.co.uk/news/uk-england-beds-bucks-herts-17208319</p>
ISSDP40	Elaine De Can	Canvey Island Town Council	Yes	Other opportunities that should be identified are the need for more cycle paths, the provision of bike rental as supplied in London and more opportunities for youth.
ISSDP76	Miss Jo Hardwick	Environment Agency	Yes	<p>Very few opportunities to enhance the environment have been recognised which is disappointing. To deliver sustainable development it is necessary to consider environment, social and economic matters equally.</p> <p>As the "threats" section of the discussion paper identifies, a significant proportion of the Borough is located within Flood Zone 3 and this risk will increase with climate change. There are however opportunities that can be taken to address and help mitigate this risk, many of which are identified in our draft TE2100 plan. These include the following:</p> <ul style="list-style-type: none"> The draft plan sets out our preferred option is to improve the defences protecting Canvey Island over the next 100 years to ensure flood risk does not increase with climate

ID	Name	Organisation	Yes/No	Comment
				<p>change. There is however no guarantee that central funding will be available in the future to provide these works so it is important that, where appropriate, new development contributes to these works. This could be a financial and/or physical contribution. With the latter there are many benefits to the applicant including the provision of a more aesthetically pleasing defence than we may provide which is more suited to residential developments. Further, where a development is proposed behind the defences, we will mostly likely ask for a safeguarded area to ensure future defence options are not compromised. This area can however be minimised if the applicants work with us to provide the defence, or part of it.</p> <ul style="list-style-type: none"> • The development of a community flood response plan should be promoted and facilitated by the Local Plan. Education of the population at risk should also be encouraged. • Opportunities to relocate or replace vulnerable developments such as single storey dwellings, mobile homes parks and camp sites should be encouraged within the Plan. • The extension of Roscommon Way could help to provide improved emergency access and egress to/from the south of Canvey in the event of flooding. • Evacuation of the population of Canvey Island in a flood event would be very challenging. The provision of safe havens, high level access and shelters should therefore be promoted in the plan. <p>Our TE2100 Plan also advises it is necessary to replace intertidal areas which are lost in the estuary due to climate change. Both Bowers Marsh and West Canvey Marsh which lie within your area have been identified as opportunities to create a new intertidal marsh in the future. This presents an opportunity to improve recreational opportunities for the area, as well as improving the network of green infrastructure across the Borough and wider region.</p> <p>Further opportunities should also be taken to meet the objectives of the Water Framework Directive, the overall aim of which is to establish a strategic framework for managing all waterbodies through common objectives and principles. The key objectives include:</p> <ul style="list-style-type: none"> • Prevent deterioration of water quality; • Protect, enhance and restore waters to 'Good Ecological Status' by 2015 (or if not by 2021 or 2027); • Promote sustainable water use; • Reduce pollution; • Contribute to mitigating the effects of floods and droughts. <p>You should refer to both the Anglian and Thames River Basin Management Plans for further guidance on the opportunities that should be promoted in the Local Plan. The benefits of meeting the WFD objectives are likely to be wide ranging, including improving amenity spaces for the public to enjoy.</p>
ISSDP98		Barratt Homes	Yes	<p>We do not consider that all the 'opportunities' have been identified in the discussion paper. The opportunity part of a SWOT analysis should reflect the strengths and weaknesses previously identified and set out how these may be addressed and rectified.</p> <p>As set out above, it is considered that the Green Belt designation is seen as both a 'strength' and a 'weakness' and that there is a limited unconstrained land supply to deliver new homes. As such, we consider that an additional 'opportunity' (that identifies the need to review the release of sufficient greenfield land and, likely, the release of the most appropriate and sustainable Green Belt land) must be explored through the formulation of the New Local Plan. This opportunity would seek to rectify the current weakness of housing land supply and ensure that the Council is in a position to provide for a suitable planning framework to meet the needs of future generations in the Borough.</p> <p>We therefore consider a Green Belt boundary review should be identified as an opportunity. Given the number of strengths identified in the Discussion Paper and in demonstrating that Castle Point is an attractive place to live and work, it is considered essential that in order to provide for future generations who wish to move to, or remain within the Borough, CPBC will need to review its Green Belt boundary in order to accommodate future sustainable development that meets this need.</p>
ISSDP112	Felstead Road	Redrow Homes	Yes	<p>Yes, the consultation does not identify all of the opportunities that an increased supply of housing in the Borough will bring. The release of land from the greenbelt will not only provide funding for improvements to infrastructure and services in the Borough via Section 106 and Community Infrastructure Levy (CIL), it will also provide much needed investment to the Borough from the New Homes Bonus. The New Homes Bonus provides financial reward to Councils that are successful in delivering housing growth and offers a substantial opportunity for Castlepoint to bring significant and needed economic growth to the Borough. Funding from the New Homes Bonus, would provide the Council with the opportunity to address the identified weaknesses in the Borough, above those, which could realistically be provided from Section 106 and CIL funding.</p>
ISSDP121	East of Central Avenue	Redrow Homes	Yes	<p>Yes, the consultation does not identify all of the opportunities that new housing development in the Borough will bring. The release of land from the greenbelt will not only provide funding for improvements to infrastructure and services in the Borough via Section 106 and Community Infrastructure Levy, it will also provide much needed investment to the Borough from the New Homes Bonus. The New Homes Bonus provides financial reward to Councils that are successful in delivering housing growth and offers a substantial opportunity for Castlepoint to bring significant and needed economic growth into the Borough. Redrow Homes are committed to working with the Council to bring forward development on land to the east of Central Avenue. If allocated Redrow Homes would be in a position to bring forward a deliverable development, which would provide funding for the Council to spend on local residents as part of the New Homes Bonus.</p>
ISSDP130	Mr Richard Reeves		Yes	<p>Yes, the consultation does not identify all of the opportunities that new housing development in the Borough will bring. The release of land from the greenbelt will not only provide funding for improvements to infrastructure and services in the Borough via Section 106 and Community Infrastructure Levy, it will also provide much needed investment to the Borough from the New Homes Bonus. The New Homes Bonus provides financial reward to Councils that are successful in delivering housing growth and offers a substantial opportunity for Castlepoint to bring significant and needed economic growth into the Borough.</p>

ID	Name	Organisation	Yes/No	Comment
ISSDP138	Mr Roy Lewis	Essex County Council	Yes	<p>The following should be added to the list of opportunities,</p> <ul style="list-style-type: none"> The opportunity to attract investment into the Borough is enhanced by its position in Thames Gateway South Essex and the Thames Gateway Growth Area and the fact that it is recognised as a priority in the SELEP and the ICS. Development within the Borough will attract inward investment together with developer contributions to facilitate enhancements to education, health care and transport infrastructure.
ISSDP162	GMPF	Thameside Metropolitan Borough Council		<p>GMPF notes that the 'Opportunities' section states that the Castle Point Regeneration Partnership has already secured investment for the preparation of Masterplans for the regeneration of Canvey and Hadleigh Town Centres, which provides a firm basis for future public and private sector investment.</p> <p>GMPF responded to the Canvey Town Centre Masterplan in August 2011, stating that although they welcome the approach to enhance the town centre, they are concerned that the Masterplan does not reflect their aspirations to enhance the Knightswick Centre in the short to medium term. GMPF maintained that the Masterplan was 'too prescriptive', and if adopted, would discourage existing owners from investing in the town centre.</p> <p>GMPF considers, therefore, that whilst the Masterplan represents an 'Opportunity', it is also perceived as a 'Threat' to inward investment and future development within the Town Centre, because it is too prescriptive.</p> <p>The Knightswick Centre, incorporating Sainsbury's and the car park site, provide an ideal opportunity for promoting future growth in the town centre. There should be a direct reference to this in the discussion paper rather than relying on the Masterplan.</p> <p>Opportunities to encourage housing growth and improve access to Canvey Island should be considered here in more detail. This will reflect the Government's direction of travel in relation to the NPPF and ambition for growth and investment.</p>
ISSDP168		WM Morrisons Supermarket Plc	Yes	<p>It is noted following the findings of the Inspector, and taking into account emerging national planning guidance, that the Council has chosen not to take forward the Core Strategy and, instead, produce a new Local Plan.</p> <p>In parallel, our client is in the process of reviewing and assessing their land holdings in West Canvey. At present, proposals are currently being explored for significant, long-lasting and wider ranging environmental and social improvements across the west of the Island (which it is noted, is also a long-standing aspiration of the Council). It is envisaged that these improvements will, where necessary, be enabled by an appropriate level of development close to the existing built up area.</p> <p>In these terms, our client has opened discussions with potential partners to explore the options available to them, and once these initial discussions have been held, we will update you on the outcome of these investigations and present my client's thoughts to you for discussion and, hopefully, agreement.</p> <p>However, in the interim, it is requested that the Local Plan should be drafted in a manner to acknowledge these aspirations coming forward.</p>
ISSDP178		Barratt Homes	Yes	<p>SITE SPECIFIC REPRESENTATION - East of Rayleigh Road</p> <p>See attachment from page 11</p>
ISSDP179	Felstead Road	Redrow Homes	Yes	<p>SITE SPECIFIC REPRESENTATION - FELSTEAD ROAD</p> <p>The consultation and SWOT analysis provides a good account of the key issues and opportunities within Castlepoint. The New Local Plan will be a critical document in addressing the key weaknesses, and provides a framework for Castlepoint to benefit from the identified opportunities and build upon the existing strengths. The only realistic opportunity to address the existing problems in Castlepoint in terms of infrastructure, affordable housing, GP surgeries and lack of public open space is via funding from new development. With the identified significant shortage of brownfield land for development, new investment and growth in the Borough needs to be met by the strategic release of appropriate greenbelt sites.</p> <p>There is a need for the Council to provide a balance between the three mainland settlements in Castlepoint (Benfleet, Hadleigh and Thundersley). Canvey Island being situated within a flood zone 3 is sequentially in flood risk terms not suitable for a high quantum development.</p> <p>With regard to Benfleet the consultation identifies that growth is constrained to the north, south and west. The only realistic area for expansion is to the east, and of the sites in east Benfleet, Land at Felstead Road is the most suitable site for the development. It has a number of benefits, which include the following:</p> <ul style="list-style-type: none"> It is very well enclosed in the urban framework and unlike the release of other greenbelt sites, development on this site will not affect the openness of wider and strategic areas of the greenbelt.

ID	Name	Organisation	Yes/No	Comment
				<ul style="list-style-type: none"> It is situated in a very sustainable location, adjacent to a main bus route and two local schools. It is also within very short walking distance of a secondary school and a parade of shops, which would offer services for local residents. The site is fully deliverable in that the landowners are fully committed to bringing a residential development forward on the site. There is an opportunity to provide vehicular, cyclist and pedestrian access from a number of different roads around the site. Redrow Homes are committed to a landscape lead approach to development of the site, which will seek to protect and enhance existing vegetation and ecological features on the site It is located outside the flood zone and sustainable urban drainage will be incorporated into the proposals. <p>Taking the above into consideration, the Council are urged to allocate land at Felstead Road as a housing site to provide much needed housing for the Borough as part of the New Local Plan.</p>
ISSDP180	East of Central Avenue	Redrow Homes	Yes	<p>SITE SPECIFIC REPRESENTATION - EAST OF CENTRAL AVENUE, HADLEIGH</p> <p>The SWOT analysis has identified most of the key issues currently affecting Castlepoint. The New Local Plan offers the opportunities to address many of the key weaknesses and threats facing Castlepoint. The only realistic way of addressing the existing problems in terms of infrastructure, affordable housing and delivering improvements to health and town centres is via funding from new development. Given the significant shortfall of brownfield land for development, new investment and growth in the Borough needs to be assisted by the careful and strategic release of greenbelt sites.</p> <p>There is a need for a balance between growth in the three mainland settlements in Castlepoint (Benfleet, Hadleigh and Thundersley). Canvey Island being situated within a flood zone 3 is sequentially in flood risk terms not suitable for development. With regard to Hadleigh the Council has identified that it would not be suitable to allocate growth to the south of the town centre, or to the east or west of the town centre. The Councils rationale behind this approach is fully supported, and it correctly directs growth to the north of the town centre. Land to the east of Central Avenue, Hadleigh has a number of benefits and should be allocated for development. These are listed below:</p> <ul style="list-style-type: none"> It is situated in a location where it will not compromise the strategic openness of the greenbelt It is well contained by the woodland to the east of the site, and will not result in coalescence with Daws Heath, Rayleigh and Eastwood It is under a single ownership and Redrow Homes are fully committed to working with the Council to bring the site forward for housing development It has the opportunity for a direct access from the site onto Central Avenue It is located outside of the flood zone Provision will be made for the careful management of the development in relation to the woodland (SSSI) to the east. Opportunity to create area of public open space for local residents to the north of the residential area <p>Taking the above points into consideration, the Council are urged to allocate land to the east of Central Avenue as a housing site within the New Local Plan.</p>
ISSDP181	Mr Richard Reeves			<p>SITE SPECIFIC REPRESENTATION - LAND SOUTH OF ESSEX WAY</p> <p>The SWOT analysis has identified most of the key issues currently affecting Castlepoint. The New Local Plan offers the opportunities to address many of the key weaknesses and threats facing Castlepoint. The only realistic way of addressing the existing problems in terms of infrastructure, affordable housing and delivering improvements to health and town centres is via funding from new development. Given the significant shortfall of brownfield land for development, new investment and growth in the Borough needs to be assisted by the careful and strategic release of greenbelt sites.</p> <p>There is a need for a balance between growth in the three mainland settlements in Castlepoint (Benfleet, Hadleigh and Thundersley). Canvey Island being situated within a flood zone 3 is sequentially in flood risk terms not suitable for development. Land to the south of Essex Way, Benfleet has a number of benefits and therefore should be allocated. These are listed below:</p> <ul style="list-style-type: none"> It is situated in a location where it will not compromise the strategic openness of the greenbelt It is well contained and complements the existing residential properties to the north, south and west It is under a single ownership and Mr Reeves is fully committed to working with the Council to bring the site forward for housing development It has the opportunity for a direct access from the site onto Glyders It is located outside of the flood zone Provision will be made for the careful management of the development in relation to the sensitive landscape to the east <p>Taking the above points into consideration, the Council are urged to allocate land to the south of Essex Way, Benfleet as a housing site within the New Local Plan.</p>
ISSDP187	Mr Alex	RSPB	No	

ID	Name	Organisation	Yes/No	Comment
	Cooper			
ISSDP220	Mr Ivor Beamon	FLP Ltd		<ul style="list-style-type: none"> • Canvey Island should not be promoted by the forthcoming Local Plan as an opportunity to accommodate a significant proportion of the Borough's housing. • There are a number of issues associated with development at Canvey Island that would compromise the safe and viable delivery of significant residential development. • During the previous CS consultation process Gladman promoted Land West of Glebelands, Thundersley as a viable residential development opportunity for the Borough. • The site is sequentially preferable and exceptional circumstances have been identified to support its release from the Green Belt. • Land West of Glebelands, Thundersley is an opportunity for Castle point to provide much needed housing within the Borough and should be an allocated residential site in the New Local Plan. <p>Justification attached</p>
ISSDP226	Mr Kevin Futcher		Yes	<p>RESIDENTS ALTERNATIVE PROPOSAL FOR JOTMANS FARM</p> <p>I have submitted an idea that you may like to consider as the basis for a core strategy at Jotmans farm. Recently I was part of the team that went round door-to-door collecting signatures to protest against the previous core strategy. This contact with the community gave me the idea, which I am now putting forward to you.</p> <p>Towards the end of 2011, I spoke to approximately 200 local residents regarding the old proposal for Jotmans farm. Their response can be split into several categories.</p> <ul style="list-style-type: none"> ▪ The smallest majority was one family that was for the proposal to build on Jotmans farm. ▪ The remainder can be split into almost 3 equal size groups. <p>Group 1</p> <p>This group liked things as they were and would never change anything, their objections and fault finding of various schemes were only to stop things happening.</p> <p>Group 2</p> <p>This group was concerned about building on green belt, a genuine concern that we are eroding the green belt land.</p> <p>Group 3</p> <p>A much more realistic approach to problems faced within the community. A genuine understanding that there is a housing shortfall and that property needs to be built. Their objection was the sheer volume of properties that were being proposed. There was a genuine fear that developers will cram as many houses on a piece of land as possible without any concern for the impact on the existing community.</p> <ul style="list-style-type: none"> ▪ There were some common concerns amongst all groups. <p>Most of the people interviewed were middle-aged or retired and the majority had worked hard all their lives and moved out from London. With the exception of one family, everybody was against the social housing aspect of the councils proposed policy.</p> <p>Other concerns were the increase in traffic within the area, works that will need to be undertaken to the local sewage plant to cope with the increasing demand, and basically the loss of a very nice area to live in with horses and ponies walking the streets from the farm.</p> <p>My proposal</p> <p>Anyone who has lived in the Victorian properties of London has become used to very large properties with ample grounds. When I moved from London to Benfleet I wanted a property that reflected my expectations, a large three-bedroom property with ample grounds. I had significant funds from my London property but was very surprised that I couldn't find what I was looking for. True I could go to the top of vicarage hill and spend £1.5 million pounds, but how many of us have that sort of capital? And how many of us need five acres of ground? Something in between is what I was looking for and I failed to find it.</p> <p>Currently the area around Jotmans farm has little traffic and is a secluded safe environment. It is 20 minutes walk to Benfleet station making it an ideal location for well paid city workers.</p>

ID	Name	Organisation	Yes/No	Comment
				<p>Does it make any difference to the owners of Jotmans farm if they sell a property that uses three times as much land, as long as they can include this extra cost in the final asking price?</p> <p>Working on this principle of building higher end properties alleviates many of the concerns expressed by local residents, and significantly reduces the infrastructure demand on the drinking water supply, sewerage, surface water, gas and local traffic congestion, but most importantly it is in keeping with the area.</p> <p>It is with all this in mind that I have drawn up a rough idea of how Jotmans farm can be broken up for housing. My research showed that for high-end properties to achieve a high sale price the surrounding area is critically important.</p> <p>You will see from my plan that most of the properties back onto a grassland strip where horses can be walked, and children can ride their ponies away from the traffic. You will also see that it was deliberately designed so that you can exercise your pony, cycle or walk in a complete circle across the whole of Jotmans farm and only cross four roads.</p> <p>You will see that there are numbers written upon the plan, 1, 1.5, 2, 2.5 and 4; these are the basis of the plot size. A plot size of one is the equivalent of the average plot size that can be found south of Jotmans Lane, these plots are typically 130' x 20'.</p> <p>I have stopped at four times the standard plot size because going above this figure for the current landowner does not give a satisfactory financial return.</p> <p>Most properties south of Jotmans Lane are within the price band of £200,000 to £250,000 making an average plot value between £60,000 and £80,000 for a single property on this plot; this is using the usual figure of one-third the sale price for the land.</p> <p>As the proposed properties will back onto grassland this adds value and therefore an increase in the plot value. For simplicity I have picked a figure of £100,000 per plot.</p> <p>So the most expensive plots are £400,000 for the land and then say approximately £100,000 for the building. I see no reason why properties within this facility should not sell for around £600,000 plus. There are 514 plots available with my proposal, depending on the final asking price of each plot they should bring in around £45 to £50 million to the current farm owners.</p> <p>The conventional way of developing land is to cram as many houses as possible on to a given acreage of land. I would deduce that by the time all the additional costs and infrastructure required from mass housing is taken into consideration the overall profit is probably going to be about the same. So if the residents are willing to compromise and accept building on Jotmans farm and the current farm owners are willing to compromise and not go out for every penny they can obtain we could have something that actually benefits the community.</p> <p>There is one other thing that I would like you to consider - currently Jotmans farm is a large farm; it requires a dedicated expert farmer to manage such a large-scale establishment. If the land was not reclassified for building, but instead the farm was broken up into 220 smaller farm units, this would make a farm much more accessible to the inexperienced. Also bringing similar people with the same desires together to help each other and purchase communal equipment. I would also assume that if there were no change of use for the farm then this would save an awful lot of red tape!</p>

Question IDP7: Do you agree with the Threats identified for Castle Point?

ID	Name	Organisation	Yes/No	Comment
ISSDP3	Dr Robert Spink		No	The Borough's predilection towards building on flood plain and near to industrial plant on Canvey in particular is a real problem. Council should protect these areas for all building at all costs as is required by the Environment Agency and government policy in any event. I can not understand the Councils wish to build in flood plain and flood storage areas.
ISSDP41	Elaine De Can	Canvey Island Town Council	Yes	
ISSDP68	Mr John Hall			<p>A threat is that lack of regeneration leads to increased social tension and increased levels of antisocial behaviour.</p> <p>Over spill from London must be a real threat to bring further demands on the limited infrastructure and increased deprivation and antisocial behaviour.</p>
ISSDP77	Miss Jo Hardwick	Environment Agency	Yes	You have identified that a significant proportion of the Borough is located within Flood Zone 3 and that this risk will increase with climate change. Your Strategic Flood Risk Assessment illustrates that whilst the defences provide protection for the majority of the developed area, there are some areas which are at risk from overtopping in both the current

ID	Name	Organisation	Yes/No	Comment
				<p>and future design (1 in 200 year) and extreme (1 in 1000 year) events. Canvey Island is also at significant risk should there be a breach in the flood defences. Whilst the chance of a breach event occurring is very low, the consequences would be extremely high were it to happen. This therefore needs to be fully reflected in the development of the Local Plan.</p> <p>We are pleased that climate change has been identified as a threat in its own right; increasing flood risk and affecting habitats. The potential threat to water resources should also be recognised, as well as the likely impact on Water Quality with regards to European Legislation including the Water Framework Directive, Habitats Directive, Bathing Waters and Shellfish Waters Directive. More information on both of these issues is available in your Outline Water Cycle Study (September 2011).</p>
ISSDP99		Barratt Homes		<p>We agree that Green Belt Boundary has not been identified as a 'threat' within this analysis. However, we consider that a clear reference should be made to the threat of not providing sufficient houses within Hadleigh, Benfleet, Thundersley and Canvey Island to meet the future need and the detrimental impact that could have amongst residents and the local economy.</p> <p>The importance of ensuring that housing need is met is a central theme of national policy and lies at the heart of the National Planning Policy Framework. Any locally led approach to the quantification of that housing need would need to be supported through a robust demographical assessment.</p>
ISSDP113	Felstead Road	Redrow Homes	Yes	<p>Yes, the consultation correctly identifies flood risk as a key constraint to development with 40% of the Borough in flood zone 3. In accordance with PPS25 (Development and Flood Risk) sequentially when identifying sites for development the Council should seek to allocate sites that are outside areas at risk from flooding.</p> <p>The consultation identifies that the population in Castlepoint is ageing and as a result there will be lower levels of economic activity in Castlepoint, which will affect the ability of local businesses to grow. To address this, provision needs to be given to the residential allocation of greenbelt land, which will encourage new residents to locate in Castlepoint and will assist in supporting and growing the local businesses in the area.</p> <p>Land at Felstead Road is located outside of the Flood Zone and in an area where it is easily accessible to local services and facilities. Therefore provision of development at Felstead Road would help support the local economy and can be delivered without increasing flood risk.</p> <p>The lack of housing supply is perhaps the most significant barrier to delivering infrastructure improvements in Castlepoint and the Council needs to release land from the greenbelt in order to address this issue.</p>
ISSDP122	East of Central Avenue	Redrow Homes	Yes	<p>Yes, the consultation correctly identifies flood risk as a key constraint to development, with 40% of the Borough in flood zone 3. In accordance with PP25: (Development and Flood Risk) sequentially when identifying sites for development the Council should seek to allocate sites that are outside of areas at risk from flooding.</p> <p>The lack of housing supply is a major barrier to infrastructure improvements in Castlepoint and the Council needs to release land for housing from the greenbelt to address this.</p>
ISSDP131	Mr Richard Reeves		Yes	<p>Yes, the consultation correctly identifies flood risk as a key constraint to development, with 40% of the Borough in flood zone 3. In accordance with PP25: (Development and Flood Risk) sequentially when identifying sites for development the Council should seek to allocate sites that are outside of areas at risk from flooding.</p> <p>The lack of housing supply is a major barrier to infrastructure improvements in Castlepoint and the Council needs to release land for housing from the greenbelt to address this</p>
ISSDP148	Mr James Trimmer	PORT OF LONDON AUTHORITY	No	<p>The PLA is disappointed to note that the presence of these terminals, which offer the sustainable distribution of a nationally important cargo, is noted as a 'threat' within the discussion paper and therefore, by implication, that the Council's approach to them and the future planning of the area would appear to be comparable to that previously adopted in the Core Strategy. The PLA would question how this approach accords with the principles within the National Planning Policy Framework (NPPF) towards development, infrastructure & plan-making and furthermore what evidence base is being used to justify the statements made. Furthermore, and notwithstanding that the new HSC at the Oikos Terminal will reduce the risks to local residents, it is strange that the Council appears to be using the results of its own previous development control mistakes as a further justification for this 'threat'.</p>
ISSDP155	Jamie Melvin	NATURAL ENGLAND		<p>Both flooding and the effects of climate change are appropriately recognised as threats to the borough. They are a particular issue because 40% of the borough's land area is within flood risk zone 3, the zone of highest risk.</p> <p>Considering the future risks faced by residents and businesses the LPA has to look for opportunities to manage flood risk.</p> <p>There is a potential synergy with the opportunities recognised in Section 2.3 regarding the use of vacant land and delivery of green infrastructure to reduce the causes and impacts of flooding. For example, through development of surface water management plans; making the most of the benefits of green infrastructure for flood storage, conveyance and SUDS; re-creating functional floodplain; and setting back defences.</p> <p>Local Authorities have a duty to consider how they can, through their planning functions, adapt to the effects of climate change. The New Local Plan should address the issue of adapting to Climate Change.</p>

ID	Name	Organisation	Yes/No	Comment
ISSDP188	Mr Alex Cooper	RSPB	Yes	
ISSDP211		Oikos Storage Limited	No	<p>As will be evident from its response to Question IDP 7, Oikos disagrees fundamentally with the Council's conclusion that Oikos's terminal at Hole Haven Wharf is a 'threat'. The Paper refers to "two Hazardous Installations at South Canvey"; which it says "restrict the ability of other land in this location to be developed". The presence of these installations is said to be a "threat to the existing population".</p> <p>Oikos invites the Council to re-visit this analysis, which it disputes. It does not believe is a fair or accurate representation of the position; it is, furthermore, out of kilter with NPPF.</p> <p>It is incorrect to suggest that the only reason development is restricted in the vicinity of the Oikos and Calor terminals is because of the hazardous nature of the activities. In fact, the 1998 Local Plan designates land to the north as a Green Lung which seeks to protect the land from 'development that would adversely affect its open character, wildlife, or amenity value.' This area is also identified as being within Flood Zone 3, which further restricts the type of development that is acceptable. These considerations apply regardless of Oikos's terminal (and also its tenancy of the remaining open land between the terminal and the urban area, which is port land in the freehold ownership of the Port of London Authority).</p> <p>Finally, the Council's attention is drawn to the NPPF's re-statement of long-standing advice that local planning authorities should assume that pollution control regimes will operate effectively (paragraph 122). In Oikos's case the primary regulators are the HSE and EA, but the Council is itself the Hazardous Substances Consent Authority, in which capacity it has recently resolved to grant a new Hazardous Substances Consent. It hardly seems consistent now for the Council to classify the terminal as a "threat"</p>

Question IDP8: Are there any other Threats to Castle Point that are not identified?

ID	Name	Organisation	Yes/No	Comment
ISSDP4	Dr Robert Spink		Yes	The Council need to build 243 houses per year over the next 5 or 6 years and yet has allocations for only 81 houses per year. This will hold back the borough and the gap needs meeting with new allocations. The new allocations must be for sites that are less environmentally significant so the public interest in protecting key areas of green belt such as previously undeveloped farm land and open public access sites can be upheld.
ISSDP19	Mr Glenn Phillips		Yes	The threat to green belt land by developers should be robustly defended. Once it is gone it can never be replaced and it is what makes living in the borough enjoyable in the first place. Ancient woodland and open space is vital to the prosperity of the area.
ISSDP42	Elaine De Can	Canvey Island Town Council	Yes	Over population and additional housing, lack of roads on and off Canvey Island. Please refer to the objections stated in the reports provided for planning application CPT/707/11/OUT by the Environment Agency and Fox Land & Property Limited.
ISSDP64	Mr & Mrs Hughes		Yes	I strongly agree with the above comments.
ISSDP78	Miss Jo Hardwick	Environment Agency	Yes	<p>The drainage system on Canvey Island will need upgrading in the future. If it is not, and/or is poorly maintained, then it is likely to increase the frequency of fluvial and pluvial flooding events.</p> <p>The draft South Essex Surface Water Management Plan identifies surface water flooding as being a significant issue, largely for areas of South Benfleet and Thundersley, but also an area of Hadleigh. There are opportunities for you and developers to work with Essex County Council (the Lead Local Flood Authority and operating authority for local sources of risk) to reduce existing risks through the planning process.</p> <p>Your Outline Water Cycle Study (September 2011) also concluded that the sewerage network will need upgrading in all settlements in the Borough. The timings of this could be a threat to the timings of development and should be discussed further with Anglian Water.</p>
ISSDP139	Mr Roy Lewis	Essex County Council	Yes	<p>The following should be added to the list of threats,</p> <p>Congestion on the strategic road network accessing Castle Point and within the Borough could limit the attractiveness of the area to new investment and businesses.</p>
ISSDP163	GMPF	Thameside Metropolitan Borough Council		<p>The 'Threats' section notes that there is a significant threat to the regeneration of Castle Point's town centres from retail provision elsewhere at locations such as Lakeside, Bluewater, and Westfield at Stratford. GMPF confirms that these identified threats are significant and welcomes their identification.</p> <p>Through planned asset management, GMPF can help improve the attractiveness of the Knightswick Centre which would encourage residents to shop locally rather than travelling to shopping centres outside the Borough. However, as noted above, GMPF believes that the Canvey Town Centre Masterplan could potentially threaten future investment within the</p>

ID	Name	Organisation	Yes/No	Comment
				town centre as it is too prescriptive, and does not support GMPF's aspirations. GMPF encourages the Council to reconsider the Masterplan issues to ensure the long term success of Canvey Town Centre.
ISSDP171	Mr Andrew Dutton	Persimmon Homes		We agree that job opportunities created by major schemes elsewhere in the sub-region will benefit residents of Castle Point. However, there are concerns regarding the ability of the Borough to provide the necessary labour supply to address those enhanced employment opportunities. The precipitate withdrawal of the Core Strategy in November 2011 does challenge the proposition at page 7 of the Discussion Paper that Castle Point will become a better place to work and run a business. The inability to delivery an adequate supply of land to accommodate new housing questions the proposition that Castle Point will become a better place in which to live and presents a serious threat to enhancing employment opportunities I consider that the Discussion Paper does not take into account the following threats: <ul style="list-style-type: none"> • The lack of an acceptable housing land supply and the fundamental role of an adequate supply of housing has in fulfilling the Government's objective of securing sustainable economic development as set out at paragraph 7 of the National Planning Policy Framework (the NPPF) and the harmful impact of that failure upon the provision of affordable housing. • The potential barrier to economic investment caused by the lack of an acceptable housing supply as referred to at paragraph 21 of the NPPF. • The lack of an up-to-date, positive development plan reflecting the objectives established by the Government in the Budget 2012 and the objectives of the NPPF, particularly that of the presumption in favour of sustainable development outlined at paragraph 14. • The reluctance/inability of the Council to acknowledge that a thoroughgoing review of inner Green Belt boundaries is required so that land can be identified to accommodate new housing and employment opportunities. Such an enterprising approach will address the threats posed by the issues associated with housing affordability, the lack of investment in infrastructure and the encouragement of entrepreneurs to invest in the area. It will also accord with the requirement of the NPPF to ensure that Green Belt boundaries are capable of enduring the plan period, that they promote sustainable patterns of development and do not include land that is unnecessary to keep permanently open (see paragraphs 83 - 85 of the NPPF).
ISSDP189	Mr Alex Cooper	RSPB	No	

Town Profiles

ID	Name	Organisation	Yes/No	Comments
ISSDP156	Jamie Melvin	NATURAL ENGLAND		All the town profiles would benefit from a better description of current environmental assets, those which are valued by the local communities and those in which investment is needed. A map to support this would help to understand the current supply and deficiencies spatially. The profile for each town which is provided in under this section ends with a list of constraints to future growth. We recommend this is amended to identify constraints not just to growth but to high quality development and the creation of places where people want to live and work. It is likely that viewed in this manner, those environmental assets would be listed as opportunities rather than constraints.

Question IDP9: Do you agree with the profile for Benfleet?

ID	Name	Organisation	Yes/No	Comment
ISSDP5	Dr Robert Spink		No	Benfleet shops are very weak and under threat. Turnover is too low and the council has not helped by its policies on providing parking provisions and parking charges. The council tax issue is key to the viability of Benfleet's small shops. They must pay a much greater amount of local taxes for their services etc than bigger and out of town outlets and the Government and Council should address this unfairness before it finally destroys our highstreets.
ISSDP43	Elaine De Can	Canvey Island Town Council		No comment to make
ISSDP79	Miss Jo	Environment	Yes	We generally agree with the profile of Benfleet. It has been recognised that the playing fields South of Benfleet are multi-functional, also acting as flood plain. As advised in your

ID	Name	Organisation	Yes/No	Comment
	Hardwick	Agency		SFRA the area is a flood washland and is designated as a Category C reservoir under the Reservoirs Act 1975 and should therefore be safeguarded for its current use and not allocated for development.
ISSDP114	Felstead Road	Redrow Homes	Yes	<p>Yes, the consultation correctly identifies the significant problems with regard to affordable housing and that house prices have been pushed up to unaffordable levels because of lack of supply. 52% of local first time buyers and 42% of existing households cannot afford to buy even a flat in Benfleet. This increases to 68% and 60% respectively for terraced properties with semi- detached properties being even more difficult to access for local people. The provision of strategic greenbelt sites, such as land at Felstead Road will help address this problem by providing suitable provision of affordable housing. It will also assist in increasing the supply of housing in the Borough, thus keeping property prices at an affordable level.</p> <p>Benfleet also suffers from a lack of public open space. The provision for development of greenbelt land could provide funding for new areas of public open space to be provided.</p> <p>The Council has correctly identified that there are a number of constraints to future development in Benfleet. This significantly lowers the number of appropriate sites for development. To the north Benfleet is developed up to its boundary with no further opportunity for expansion. To the south the railway, the flood plain and designation of important areas of public open space are also key constraints on development. New growth would be inappropriate in these areas. The consultation also identifies that west Benfleet only has very limited capacity to accommodate growth.</p> <p>Taking the above into consideration the only realistic areas for major greenbelt land release would be toward the east side of Benfleet. However, much of the greenbelt to the east is heavily vegetated and not suitable for development. Land at Felstead Road, Benfleet is one of a very limited number of sites that would be suitable for development. It is acknowledged that the location of the site is sensitive in landscape terms, with a number of existing trees and vegetation on the site. Redrow Homes are committed to working with the Council to deliver a landscape lead approach for development, which will seek to protect and enhance the existing vegetation on the site. This will include protection of any features of ecological significance.</p>
ISSDP132	Mr Richard Reeves		Yes	<p>Yes, the consultation correctly identifies the town specific issues within Benfleet. As one of the most expensive places to live within Castle Point, it is important that sites, such as this one come forward that offer the opportunity for first time buyers to buy within the area.</p> <p>The identified constraints to future growth in Benfleet are particularly relevant with regard to land. The Council has correctly identified that Benfleet town is constrained to the north, with no space to accommodate additional growth, with similar constraints to the west. To the south of Benfleet the railway and marshlands constrain development, whilst to the east the Green Belt is narrow in parts and development is therefore constrained.</p> <p>Taking account of the above, the only reasonable location to accommodate housing growth in Benfleet is to the east of South Benfleet. However development in this location would only be acceptable if the Green Belt was not compromised. Land to the south of Essex Way is one of only a very limited number of sites that can be delivered in Benfleet, which will maintain separation and not affect the openness of the greenbelt. It is acknowledged that the site is located in a sensitive location in terms of landscaping, however, the development will be planned to protect and enhance this and development will give full consideration to the sensitive nature of the site.</p>
ISSDP172	Mr Andrew Dutton	Persimmon Homes		<p>I do not agree with the profile assigned to Benfleet in the context of the constraints to future growth set out at page 11 of the Discussion Paper. In particular, I would suggest that the profile for Benfleet should acknowledge the potential to release a limited amount of land from the Green Belt at its western extent to accommodate new housing. I would remind the Council of the content of Appendix 1 attached to the Briefing Paper presented to the Members' Conference in September 2011. When considering the area known as Jotmans Farm, the evaluation regarding perceived impact on Green Belt functions states that " <i>sites on the western boundary of the borough in Green Belt separating Benfleet from Pitsea. Most of the Green Belt fulfilling this function is to the west of the A130. The Green Belt boundary could be realigned to follow the A130 without impacting upon the functions of the Green Belt in this location. The A130 will provide a more robust Green Belt boundary.</i>" Such an approach would be accord with the requirements of paragraphs 83-85 of the NPPF regarding the durability and legibility of Green Belt boundaries.</p> <p>Consideration should also be given to paragraph 52 of the NPPF which outlines that " <i>The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities.</i>"</p>
ISSDP190	Mr Alex Cooper	RSPB	Yes	

Question IDP10: Do you think anything should be added to the profile for Benfleet?

ID	Name	Organisation	Yes/No	Comment
ISSDP23	Mr Paul Moore		Yes	Yes. the strip of land between the urban area and the A130 is under threat from a new development. Why has this been hidden from this paper?
ISSDP44	Elaine De Can	Canvey Island Town Council		No comment to make
ISSDP80	Miss Jo Hardwick	Environment Agency	Yes	Your Outline Water Cycle Study (September 2011) advises that both high and low predicted housing growth rates will need extensive upgrades of the sewer network in Benfleet. This could affect the timing and phasing of development and should be discussed further with Anglian Water. The surface water flood risk identified in the draft Surface Water Management Plan could be mentioned. Given the draft status of this document, we would suggest that you discuss this with Essex County Council.
ISSDP191	Mr Alex Cooper	RSPB	Yes	

Question IDP11: Do you agree with the profile for Canvey Island?

ID	Name	Organisation	Yes/No	Comment
ISSDP13	Mr Alan Diplock		Yes	A simple suggestion about Canvey Island town centre regeneration - As we all know, rents for businesses in the town are too high which cause the businesses operating there to struggle in these times of austerity, so they should be reduced by the council to allow existing businesses to survive (and also encourage new businesses to start up). However, if this is not a viable option for the Castle Point council, then maybe another way to increase business and passing trade in the town would be for the council to approach Wilkinsons (maybe even with an incentive) to see if they can set up a store there. This would increase employment in the area, provide a service of many varied products (which could help with congestion slightly off/on the island), and would provide the much needed passing trade for other businesses in the town. Wilkinsons is much more than Woolworths ever was, and provides something for everyone, at great value, which is probably why they always seem to be busy. Being such a big company, there would be little risk of setting up a store when compared to the option of a sole trader setting up a single shop in the town. Just a suggestion, but it could work on so many levels.
ISSDP45	Elaine De Can	Canvey Island Town Council	Yes	
ISSDP65	Mr & Mrs Hughes		Yes	Canvey Island is a unique place with access to good open space and coastline. However it has been allowed to deteriorate. I think that the town centre would be much improved by having a lot more small and speciality shops which would encourage more visitors and shoppers. If the shops had housing above them this would encourage more people into the town centre in the evening to frequent the local restaurants. perhaps a chain like Weatherspoon similar to the one in Rayleigh would also be a welcome addition. Similar areas to Canvey such as Mersea and Frinton have capitalised on their unique position to encourage more visitors. Free parking would also benefit the shops.
ISSDP81	Miss Jo Hardwick	Environment Agency	Yes	We generally agree with the profile of Canvey Island. The regeneration of the seafront area is recognised in the text, as is the desire to improve the public realm on the coastline across the Borough. We would welcome opportunities to work with you and developers to improve this space in a way which would also bring about improvements to the flood defences. These multiple benefits should be actively promoted and encouraged in the Local Plan. The tidal flood risk facing the island is discussed, including acknowledgement that the current flood defences will need to be upgraded in the future to account for climate change. We are however concerned with the sentence referring to the TE2100 plan which advises Canvey Island is identified as a place where 'defences will be maintained and improved up to 2100 and beyond'. It should be noted that the TE2100 plan is still in draft and has not received ministerial sign off yet. Further, the plan sets out our preferred Flood Risk Management approach for the area but there is no guarantee the Environment Agency will have the money available to fund these projects in the future. The Plan promotes a partnership approach and opportunities for contributions should therefore be sought from new developments. We would welcome the opportunity to work with you on the CIL with regards to seeking contributions for flood defence infrastructure.
ISSDP149	Mr James	PORT OF LONDON		The PLA notes the reference to the terminals, and the Coryton Refinery in Thurrock, within the Town Specific Issues for Canvey Island.

ID	Name	Organisation	Yes/No	Comment
	Trimmer	AUTHORITY		
ISSDP157	Jamie Melvin	NATURAL ENGLAND		The profile for Canvey Island lists large areas of public open space and green belt as constraints on future growth. Rather, these should be considered an asset which, if properly integrated with development, can enhance its quality and attractiveness. Given the need for redevelopment in areas such as the town centre and Canvey seafront, we consider that these environmental resources and designations are not a constraint to growth rather that they influence development proposals to help deliver quality outcomes in areas of need. We suggest that the profile for Canvey Island should be reworded in a more positive manner also considering that these environmental resources have been recognised through the allocation of the Nature Improvement Area.
ISSDP169		WM Morrisons Supermarket Plc		We note that paragraph 3.2 of the Local Plan Consultation document states that the shopping facilities at Northwick Road are recognised as a successful retail outlet. We welcome this and feel that the Council should, in policy, recognise the merits of consolidating and, where appropriate, improving and widening the offer of Northwick Road retail area, both in terms of retail and other complementary uses.
ISSDP173	Mr Andrew Dutton	Persimmon Homes		<p>I agree with that part of the profile for Canvey Island which draws attention to the fact that it is “ <i>substantially protected from flooding at present by sea defences commonly acknowledged as being some of the best in the country.</i>” In this context, I endorse paragraph 6.37 of the Core Strategy DPD (October 2010) which states that when applying the PPS25 sequential test in Castle Point “ <i>it is important to have regard to the local context. Canvey Island is a distinctive community with identified needs in terms of social, economic and physical regeneration. Development that would meet these needs and support regeneration will therefore be permitted, provided that an Emergency Plan for the Island is in place and that the development is of a flood resistant or flood resilient design.</i>” It is recognised that PPS 25 has now been revoked and replaced by the NPPF which maintains provision for the Sequential Test and Exception Test and therefore the above statement should be maintained and amended to reflect the NPPF. In addition I consider that reference should be made to paragraph 102 of the NPPF which advises that development proposals that provide benefits to the community that outweigh flood risk should be approved.</p> <p>I consider that the profile for Canvey Island could be enhanced if appropriate reference is made to the conclusions contained within the Core Strategy Topic Paper 1: Green Belt (May 2010). The Topic Paper refers to land east of Canvey Road, noting that whilst the Council considered that it may fulfil a Green Belt function at the local level, its development would not harm the strategic functions of the Green Belt in Castle Point, “ <i>but rather represent an appropriate and proportionate local response to local housing needs as part of balanced and sustainable core strategy.</i>” Table 6.3 of Topic Paper 1 shows that land east of Canvey Road does not contribute towards the strategic function of the Green Belt. This clear assessment should be included within the profile for Canvey Island.</p>
ISSDP192	Mr Alex Cooper	RSPB	Yes	
ISSDP212		Oikos Storage Limited	No	Section 3.2 repeats the description of the Oikos terminal as a constraint to future growth. Oikos's response to Question IDP 7 is therefore also relevant to this question. As matters stand there is no indication that the necessary consultation zones stand in the way of any development proposals. Lest the Council be tempted to resurrect its previous aspiration for redevelopment of the south Canvey waterfront, Oikos restates its commitment to the site and confirms it has no intention of vacating it for the foreseeable future.
ISSDP217		Petroplus Refining and Marketing Limited (Petroplus)	Yes	<p>'X-X Line'</p> <p>Petroplus support the Council's inclusion and recognition of the Coryton Oil Refinery Complex's 'x-x' line on page 14 of the <i>New Local Plan Issues Discussion Paper</i>. Petroplus promoted recognition of the additional buffer zone in letters of representation to the Council for the emerging Castle Point Core Strategy and at its Examination in Public. Petroplus note that the <i>New Local Plan Issues Discussion Paper</i> (page 14) states that:</p> <p>"Additionally, the site in Thurrock has an additional buffer zone marked by an 'x-x' line in which development should be limited."</p> <p>Petroplus believe that the sentence should be amended to state:</p> <p>"Additionally, the site in Thurrock has an additional buffer zone marked by an 'x-x' line in which development should not occur."</p> <p>Development should not occur within this additional buffer zone because it would be poor planning, and for health and safety reasons. as any development within this boundary would be too close to the operational refinery. Petroplus believe that the <i>New Local Plan</i> should contain an illustration of the 'x-x' line boundary, as set out in Appendix 5 attached to this letter to add context to the statement. This should be marked on a 'Castle Point Key Diagram' for inclusion in the <i>New Local Plan</i>. The key should refer to the '*Oil Refinery Complex Buffer Zone'.</p> <p>Green Belt</p> <p>Petroplus support the Council's recognition of the large area of Green Belt to the west of Canvey that has acted to prevent urban sprawl and protect the countryside from encroachment. The Castle Point Green Belt Function Assessment 2010 and the Castle Point Green Belt Character Assessment 2010 highlight the importance of Green Belt parcels 23, 27 and 28 in restricting urban sprawl and safeguarding encroachment from west Canvey and Thurrock as well as their ecological, visual and landscape sensitivities which</p>

ID	Name	Organisation	Yes/No	Comment
				<p>constrain any development.</p> <p>Petroplus would encourage the Council to continue to recognise the importance of the Green Belt, particularly Green Belt land located in the west and south west of Canvey Island and ensure that development is permitted only in very ' <i>exceptional circumstances</i> ' as stated in PPG2 'Green Belts' (Para. 2.6). Furthermore, development should not occur within the Coryton Refinery complex's additional buffer zone, marked by an :x-x' line. Petroplus welcomes the inclusion and recognition of this `x-x' line' on page 14 of the <i>New Local Plan Issues Discussion Paper</i>.</p> <p>Summary</p> <p>Petroplus encourage the Council to continue to recognise the importance of the Green Belt, particularly Green Belt and located in the west and south west of Canvey Island as well as the ecological importance of Holehaven Creek and Canvey Wick SSSIs, which should be protected from any development in the New Local Plan.</p> <p>Petroplus support the Council's inclusion and recognition of the Coryton Oil Refinery Complex's `x-x' line. However. Petroplus suggest that the wording in the New Local Plan should be strengthened to state that development should not occur within this line and that the document should contain an illustration of the `x-x' line boundary on the key diagram.</p>

Question IDP12: Do you think anything should be added to the profile for Canvey Island?

ID	Name	Organisation	Yes/No	Comment
ISSDP46	Elaine De Can	Canvey Island Town Council	No	
ISSDP82	Miss Jo Hardwick	Environment Agency	Yes	<p>Your Outline Water Cycle Study (September 2011) advises that the sewage network (including pumping stations, gravity sewers and rising mains) on Canvey Island is likely to need upgrading. This could affect the timing and phasing of development and should be discussed further with Anglian Water.</p> <p>We also identified in our response to Question IDP8 that the drainage system on Canvey Island will need upgrading in the future. If it is not, and/or is poorly maintained, then it is likely to increase the frequency of fluvial and pluvial flooding events. The impact of this on development, and ways the development can help mitigate this risk, should be considered in the Local Plan.</p> <p>An aspiration for you to work with members of the Essex Resilience Forum to develop an Evacuation Plan for the Island for major industrial or environmental incidents should also be included.</p>
ISSDP140	Mr Roy Lewis	Essex County Council	Yes	The reference to the Knightswick Shopping Centre being 'intro-centric' should be explained in clearer wording together with an explanation of the implications for the functioning of the town centre.
ISSDP164	GMPF	Thameside Metropolitan Borough Council		<p>GMPF does not agree with the Canvey Island section which notes that the Knightswick Shopping Centre is an '<i>imposing intro-centric 1970s development in the middle of the town centre</i>'. The document states further that the retail offer in the town centre has suffered during the recession and a number of shops have closed. It states that the town centre has a poor public realm that needs to be upgraded and maintained.</p> <p>GMPF objects to the negative commentary of the Knightswick Shopping Centre. The Centre provides an important retail function in the town centre, incorporating Sainsbury's as an anchor. GMPF encourages the Council to recognise that the owner (GMPF) is keen to invest in the town centre, and plans are currently being progressed.</p> <p>The document notes further that shopping facilities are available in West Canvey i.e. Morrison's and outstanding planning consent for development of retail warehouses further stating that '<i>these provide opportunities for jobs in retail additional to those in the town centre</i>'.</p> <p>GMPF is concerned that the document is supportive of additional retail warehousing in West Canvey. The Council is encouraging retail development out-of-centre which is contrary to National Policy. In order to ensure the town provides a strong retail offer and thrives, policy must focus on the town centre first approach. Further retail warehousing at West Canvey should not be supported.</p>
ISSDP193	Mr Alex Cooper	RSPB	Yes	Yes, we would mention the role that West Canvey Marshes RSPB reserve plays in providing an accessible green area for local people to exercise.

Question IDP13: Do you agree with the profile for Hadleigh?

ID	Name	Organisation	Yes/No	Comment
ISSDP47	Elaine De Can	Canvey Island Town Council		No comment to make
ISSDP123	East of Central Avenue	Redrow Homes		<p>Yes, the consultation acknowledges that lack of affordable housing within Hadleigh and that first time buyers in Hadleigh are struggling to get onto the housing market. The delivery of affordable housing to meet the identified need can be facilitated by the release of land from the greenbelt.</p> <p>The identified constraints to future growth in Hadleigh are particularly relevant with regard to land to the east of Central Avenue, Hadleigh. The Council has correctly identified that Hadleigh town is constrained to both the east and west, with no space to accommodate additional growth. It also notes the significant landscape value associated with the greenbelt land to the south of the town, which has historical features subject to national, European and international protection. The consultation identifies that:</p> <p>‘there is no realistic capacity to accommodate growth in this location.’</p> <p>Taking account of the above, the only reasonable location to accommodate housing growth in Hadleigh is to the north of the town centre. However, greenbelt development would only be suitable to the north of the centre provided that any development maintains the separation between Daws Heath, Rayleigh and Eastwood. Land to the east of Central Avenue is one of only a very limited number of sites that can be delivered in Hadleigh, which will maintain separation with the above three settlements and not affect the openness of the greenbelt. It is acknowledged that the site is located in a sensitive location adjacent to the SSSI to the east. However, the development will be planned to protect and enhance this woodland and development will give full consideration to the sensitive nature of the site.</p>
ISSDP194	Mr Alex Cooper	RSPB	Yes	

Question IDP14: Do you think anything should be added to the profile of Hadleigh?

ID	Name	Organisation	Yes/No	Comment
ISSDP48	Elaine De Can	Canvey Island Town Council		No comment to make
ISSDP83	Miss Jo Hardwick	Environment Agency	Yes	<p>Your Outline Water Cycle Study (September 2011) advises that there are critical flooding problems within the network serving Hadleigh which is operating at or even above its capacity. Upgrades to the sewage network and Wastewater Treatment Works at Southend are required to address this issue. This could have serious impacts on the timing and phasing of development and should be discussed further with Anglian Water.</p> <p>The surface water flood risk identified in your draft Surface Water Management Plan could be mentioned. Given the draft status of this document, we would suggest that you discuss it with Essex County Council.</p>
ISSDP100		Barratt Homes		<p>We agree that Hadleigh has been identified as a providing a good opportunity to work and shop and has good community infrastructure with access to schools, GP surgeries and open space. As such, it is recognised as a sustainable location and therefore an appropriate place to locate development. We also recognise that Hadleigh has had a number of brownfield opportunities that have now been exhausted, and that the Green Belt boundary is tightly drawn around the developed area.</p> <p>As such, we recognise that future housing growth needs to be considered and tested against prevailing plan making policies including the suitability and appropriateness of locations to accommodate growth. In this context, and by way of example only, we consider that as 40% of the Borough has been identified as being within Flood Zone 3 (as set out in the ‘threats’ section) and therefore greater emphasis will need to be placed on the locations outside of such areas of constraint to deliver sustainable development. This will, in the context of Hadleigh, require Green Belt review and this should be reflected in its profile.</p>
ISSDP141	Mr Roy Lewis	Essex County Council	Yes	Reference should be made to the Olympic mountain bike location and the legacy project for the facility together with the presence of Hadleigh Castle Country Park.
ISSDP195	Mr Alex Cooper	RSPB	No	

Question IDP15: Do you agree with the profile for Thundersley?

ID	Name	Organisation	Yes/No	Comment
ISSDP49	Elaine De Can	Canvey Island Town Council		No comment to make
ISSDP196	Mr Alex Cooper	RSPB	Yes	

Question IDP16: Do you think anything should be added to the profile of Thundersley?

ID	Name	Organisation	Yes/No	Comment
ISSDP50	Elaine De Can	Canvey Island Town Council		No comment to make
ISSDP84	Miss Jo Hardwick	Environment Agency	Yes	Your Outline Water Cycle Study (September 2011) advises that Thundersley is served by both Benfleet and Southend Wastewater Treatment Works. For the areas in the Benfleet catchment, the WCS advises the sewer network will most likely need upgrading to accommodate increased flows. For areas in the Southend catchment, the WCS advises there are critical flooding problems within the network which is operating at or even above its capacity. Upgrades to the sewage network and Wastewater Treatment Works at Southend are required to address this issue. This could seriously affect the timing and phasing of development and should be discussed further with Anglian Water. The surface water flood risk identified in your draft Surface Water Management Plan could be mentioned. Given the draft status of this document, we would suggest that you discuss it with Essex County Council.
ISSDP197	Mr Alex Cooper	RSPB	No	
ISSDP208		Jetbury Investments Ltd	Yes	We disagree with the reference to the Green Belt land in Thundersley. As stated above, concerns have been raised over CPBC's ability to deliver sufficient housing to meet the borough's demand. Furthermore, the letter dated 11 th May 2011 from the Inspector to CPBC states: <i>'I therefore consider that the Council needs to revisit its assessment of Green Belt locations paying particular regard to the five purposes of the Green Belt as set out in PPG2. I accept that other considerations will also influence the choice of sites but potential locations should not be dismissed because local factors are given too much weight. This appears to have happened previously.</i> <i>The Council's desire to protect its Green Belt areas is understandable but its approach has also had a considerable bearing on the overall distribution of growth promoted in the Core Strategy'</i> (Note the five Green Belt purposes remain in the NPPF (Paragraph 80)). In this letter the Inspector gives clear guidance: <i>'In this respect, I consider it would be difficult to endorse a strategy which commits to Green Belt release in an area of potential high flood risk at Canvey Island yet fails to identify more than a token amount of land on the mainland where flooding is not a significant issue. While I accept some development at Canvey Island may be required to meet local needs and to support services, I am not convinced that maintaining the current distribution of development across the Borough is justified given the existing constraints'.</i> It is therefore important that a full assessment of Green Belt sites is undertaken. The NPPF (paragraph 111) encourages re-use of previously developed (brownfield land), however, it does not include a brownfield first policy. Within CPBC it is clear that there are insufficient brownfield sites to meet the borough's housing targets and it is therefore essential that appropriate greenfield/Green Belt sites are considered for housing. Land at Kiln Road was identified for 210 dwellings in the draft Core Strategy. This land is safeguarded for homes in the adopted Local Plan. There is currently an application for 310 homes (CPT/708/04/OUT) on this site awaiting determination by the Council. The delivery of the site is critical to the Council's housing supply. Jetbury Investments Ltd is seeking to

ID	Name	Organisation	Yes/No	Comment
				<p>move this application forward with the Council.</p> <p>There is further land to the west of this land at Kiln Road which is currently within the Green Belt (24.37 ha, known as Phase 2). Representations have been submitted on behalf of Jetbury Investments Ltd identifying this land as having the potential to deliver housing within the Borough. This land does not serve the five purposes of including land within the Green Belt (NPPF) and is a sustainable site which could make a meaningful contribution to the Borough's housing supply, including affordable housing. This further Green Belt land is highly sustainably located. It is well linked to existing social and community services and an existing safeguarded housing site, currently the subject of planning applications.</p> <p>It is our view that the Council does not have a five year supply of housing and needs to identify additional Green Belt sites for release. It is clear that the Core Strategy Inspector was not convinced by the previous reliance on Green Belt release in Canvey Island nor on its reliance on the regeneration of two town centre locations at Hadleigh and Canvey Island to contribute towards its housing targets.</p> <p>It is important that the New Local Plan addresses the concerns raised by the Inspector in relation to the Core Strategy.</p>

Question IDP17: Do you agree with the list of documents proposed to be included within the policy context?

ID	Name	Organisation	Yes/No	Comment
ISSDP6	Dr Robert Spink		Yes	The Council has failed to make proper and timely decisions regarding the protection of environmentally high value and undeveloped Green belt and balanced this with the need for provision of much more housing, particularly affordable housing which is for sale rather than rent. The council should identify lower environmentally sensitive sites and allocate housing for these sites, particularly on the mainland in Benfleet and Thundersley.
ISSDP11	Mr Adrian Fletcher		No	Great notice of the Disability Discrimination Act 1995 must be given as this Act is still in force along with The Disability Discrimination 2005 and The Equality Act 2010. These documents should also be included in the reference library as little credence is given to the large percentage of disabled people whether resident or visiting the Borough.
ISSDP51	Elaine De Can	Canvey Island Town Council	Yes	
ISSDP69	Mr John Hall			Most of the documents referenced lack the scale of public consultation that would appear desirable and limit the effectiveness of consultation on this document.
ISSDP85	Miss Jo Hardwick	Environment Agency	Yes	We are pleased you have acknowledged the TE2100 plan will be a fundamental element of informing what is included in the New Local Plan. It is also pleasing that you have listed the Thames Gateway Green Grid Strategy (and South Essex Parklands).
ISSDP150	Mr James Trimmer	PORT OF LONDON AUTHORITY	No	The PLA would contend that relevant NPS's should be included within policy context for the New Local Plan and, in particular, those relating to ports and energy, both of which are of relevance to the terminals within the Borough.
ISSDP174	Mr Andrew Dutton	Persimmon Homes		I am surprised at the distinction drawn in the first paragraph at page 20 of the Discussion Paper between consultation, which is deemed to be " <i>a fundamental element</i> " and policy documents that " <i>may also</i> " have an influence. Those policy documents, combined with the evidence base described at section 5 of the Discussion Paper, will have a significant bearing upon the robustness/soundness of the New Local Plan.
ISSDP198	Mr Alex Cooper	RSPB	Yes	
ISSDP221	Mr Ivor Beamon	FLP Ltd		<ul style="list-style-type: none"> The National Planning Policy Framework (NPPF) promotes growth through a proactive planning system that encourages and facilitates development. The Local Plan should not arbitrarily constrain growth through restrictive policies and insufficient allocations that prevent the housing needs of the Borough been satisfied during the local plan period. The Local Authority should positively embrace development that meets the social, economic and environmental needs of the Borough. The Castle Point Green Belt Functions Assessment 2010 both requires a specific review relating to site specific site put forward in the SHLAA rather than generic landscape areas. As it stands this document is insufficient to carry out a proper green Belt review of the Borough. The importance of updating the Documents for the evidence base prior to the New Local Plan is critical to provide a sound strategy. From our experience the Local Wildlife Site designation relies on evidence over 10 years old and does not reflect the current character, flora and fauna that exists today. A sound plan should not be based on historic evidence. <p>Justification attached</p>

Question IDP18: Do you think any other policy documents should be included within the policy context?

ID	Name	Organisation	Yes/No	Comment
ISSDP52	Elaine De Can	Canvey Island Town Council	Yes	Would need more details of which other policies are available.
ISSDP86	Miss Jo Hardwick	Environment Agency	Yes	We suggest you also refer to the Code for Sustainable Homes and BREEAM standards.
ISSDP115	Felstead Road	Redrow Homes	Yes	Yes the New Homes Bonus and the Localism Act should both be referred to as relevant policy documents, which are particularly important in determining the requirement and levels of new housing within the Borough.
ISSDP124	East of Central Avenue	Redrow Homes	Yes	Yes, the New Homes Bonus and the Localism Act should both be referred to as relevant policy documents, which are particularly important in determining new housing in the Borough.
ISSDP133	Mr Richard Reeves		Yes	Yes, the New Homes Bonus and the Localism Act should both be referred to as relevant policy documents, which are particularly important in determining new housing in the Borough.
ISSDP142	Mr Roy Lewis	Essex County Council	Yes	The following documents should be included, <ul style="list-style-type: none"> ECC Developers' Guide to Infrastructure Contributions and Education Contribution Guidelines Supplement.
ISSDP158	Jamie Melvin	NATURAL ENGLAND		Other policy documents of particular relevance considering the flooding, water quality and water resources issues recognised and opportunities for biodiversity include: <ul style="list-style-type: none"> PPS: Planning and Climate Change Supplement to PPS1 both in regarding to guidance on mitigating and adapting to climate change. Biodiversity 2020: A strategy for England's wildlife and ecosystem services and in particular the Essex Biodiversity Action Plan Natural England Accessible Natural Greenspace Guidance (2010) "Nature Nearby" The Environment Agency Thames River Basin Management Plans (2009) Essex and South Suffolk Shoreline Management Plan 2 Essex and Suffolk Water Resource Management Plan
ISSDP199	Mr Alex Cooper	RSPB	Yes	Yes, the Natural Environment White Paper, which is likely to influence the policy context of the New Local Plan.

Question IDP19: Do you agree with the list of documents proposed to form part of the evidence base?

ID	Name	Organisation	Yes/No	Comment
ISSDP7	Dr Robert Spink		No	Greater emphasis must be put on national flood protection policies to prevent building in flood plain or storage areas or areas around those flood risk areas which would make dealing with a flood or evacuation more difficult for Canvey.
ISSDP29	Mr Roy Warren	Sport Park At Loughborough	Yes	The production of the Playing Pitch Assessment is welcomed as this was advocated during the preparation of the core strategy. However, as this document does not yet appear to be publicly available it will be important that it is made available for stakeholder review before the next stage of the local plan process so that it can be considered. Sport England would request that it has an opportunity to consider the assessment so that it can make comments on its robustness before it is used for informing policies in the local plan.
ISSDP53	Elaine De Can	Canvey Island Town Council	Yes	We trust that CPBC have covered the required documents.
ISSDP87	Miss Jo Hardwick	Environment Agency	Yes	We are pleased that you have listed the following documents which will form part of the New Local Plan evidence base: <ul style="list-style-type: none"> - Castle Point Strategic Flood Risk Assessment (2010) - Castle Point Water Cycle Study (2011) - South Essex Surface Water Management Plan

ID	Name	Organisation	Yes/No	Comment
ISSDP101		Barratt Homes		<p>Whilst we recognise that the Evidence Base as listed within Section 5 of the Discussion Paper is extensive, we would highlight that the previous failings of the Core Strategy during the examination process was, in part, due to a flawed evidence base (particularly the Strategic Housing Land Availability Assessment) and that the evidence base was not correctly or appropriately interpreted into the previous Core Strategy's overall 'spatial strategy'. This issue was stressed in our previous Local Development Framework Representations and also by the Core Strategy Inspector.</p> <p>Upon reviewing the documents that form the proposed Evidence Base, it is evident that the following documents are missing which formed the Evidence Base for the Core Strategy:</p> <ul style="list-style-type: none"> • 'Assessment of the Sustainability of Sites in the Urban Periphery June 2008'; • 'Revised Assessment of Sites on the Urban Periphery September 2009'. <p>Notwithstanding the lack of the above documents identified in this Discussion Paper, we are concerned that CPBC could again fail to positively identify sufficient sites to accommodate future growth in an appropriate and deliverable strategy. It is anticipated that a Green Belt review will be necessary to accommodate growth and the identified housing need and yet two documents that previously assessed this issue have been removed from the Evidence Base.</p> <p>We question why these documents are missing, and why other documents that were identified as not being sufficiently robust (particularly the Strategic Housing Land Availability Assessment) are not identified as being updated.</p> <p>We further consider that CPBC is required within the New Local Plan's Evidence Base to demonstrate its 'Duty to Co-Operate' as required within Part 6 Section 109-110 of the Localism Act 2011. This is an important element when assessing and applying the out workings of the Essex Population and Household Projections Evidence Base as and when it has been completed identifying the future housing growth requirements.</p>
ISSDP104	Rose Freeman	The Theatres Trust		The Leisure page on the council website states that there is a Cultural Strategy but this is not accessible on this page not anywhere else. We suggest this Strategy is included as part of the evidence base or cultural activities will be excluded from the new Local Plan as there will be no basis to form policies and guidance.
ISSDP116	Felstead Road	Redrow Homes	Yes	Yes, the Strategic Housing Land Availability Assessment will be particularly important in directing new housing growth in the Borough.
ISSDP125	East of Central Avenue	Redrow Homes	Yes	Yes, the Strategic Housing Land Availability Assessment will be particularly important in directing new housing growth in the Borough.
ISSDP134	Mr Richard Reeves		Yes	Yes, the Strategic Housing Land Availability Assessment will be particularly important in directing new housing growth in the Borough.
ISSDP151	Mr James Trimmer	PORT OF LONDON AUTHORITY	No	The PLA would note that there appears to be nothing within the existing evidence base that justifies the statements within the document towards the Oikos and Calor Terminals.
ISSDP200	Mr Alex Cooper	RSPB	Yes	

Question IDP20: Do you think there is any additional evidence that will be required?

ID	Name	Organisation	Yes/No	Comment
ISSDP30	Mr Roy Warren	Sport Park At Loughborough	Yes	<p>Castle Point BC should undertake a review of its leisure facility needs including sports facilities such as swimming pools, sports halls, health & fitness suites etc. This will be important for informing policies and proposals regarding the protection and provision of community infrastructure and will be necessary to contribute towards wider objectives that the local plan will be helping to deliver such as improving public health. The Council's current evidence base on this is the Council's Leisure Strategy (2008-13). As the strategy was prepared in 2008 and is coming to the end of its lifespan there will be a need to review leisure facility needs to inform the new local plan. Sport England would advocate that a technical assessment of current and future leisure facility needs is undertaken which would assess the supply and demand of facilities. This would help inform which facilities require protection, which facilities new/enhanced provision should be made for and will also inform and justify the Council's CIL (which is pertinent in view of section 7 of this consultation suggesting that CIL could be spent on leisure facilities).</p> <p>There are a number of strategic planning tools available (see details below) for assessing sports facility needs that were not available in 2008 so more potential now exists to robustly assess needs. Furthermore leisure facility provision has been identified as a specific issue on Canvey Island for example in view of the need to modernise the Waterside Farm Sports Centre plus there has been the recent redevelopment of the island's secondary school sites which provides new dual use facilities. It will be important that an assessment/strategy is undertaken before the local plan progresses too far as this will affect the soundness of the plan in terms of being justified, effective and according with national policy. Sport England would have to object to future local plan policies on this matter which are not underpinned by a sound evidence base.</p> <p>Sport England would be willing to provide advice to the Council on the production of an evidence base for leisure/sports facilities.</p>
ISSDP54	Elaine De Can	Canvey Island Town Council		No comment to make
ISSDP88	Miss Jo Hardwick	Environment Agency	Yes	<p>We consider the following documents also need to be considered as part of the New Local Plan evidence base:</p> <ul style="list-style-type: none"> - South Essex Catchment Flood Management Plan - Anglian River Basin Management Plan - Thames River Basin Management Plan - Essex Biodiversity Action Plan - UK Biodiversity Action Plan
ISSDP143	Mr Roy Lewis	Essex County Council		<p>The evidence base should be assembled and analysed with a view to the potential impact of the following matters on the future of the Borough,</p> <ul style="list-style-type: none"> • The Budget (21st March 2012) announced that the Secretary of State for Transport (Justine Greening) will make a statement about Government airports policy in late summer 2012. This will include proposals for increased airport terminal capacity and new runways. Whether this will include a proposal for a new Thames Estuary Airport (perhaps linked to a new Thames Crossing) is unknown. However, were this proposal to proceed it could have significant impacts for the borough. • London Gateway is identified as an opportunity for Castle Point in the Issues Discussions Paper. But there may be adverse impacts on neighbouring areas, for example, by creating wage competition in the local labour market, the capturing available labour from nearby areas, and placing additional pressure on the supply of market housing. • Out-commuting from the Borough is a significant feature of the local economy. Rail fares are expected to rise significantly in real terms over the next few years. This may have implications for the distance and means by which people are willing to travel to other employment centres and for disposable incomes in the Borough. <p>Further, The following additional evidence will be required,</p> <ul style="list-style-type: none"> • A Borough transport study would provide a more robust evidence base for the Plan to support decisions on site allocations, including identification of issues and need for mitigating and supporting infrastructure. • The supporting documentation for the Local Transport Plan should be referenced since it contains information and data of relevance to development of the New Local Plan. • Commissioning School Places in Essex and The Childcare Sufficiency Assessment would assist identification of required provision of school places and childcare facilities. • The East of England Forecasting Model provides relevant economic forecasts to 2031. <p>In each of the town profiles in Section 3 reference is made to the settlements being a 'secondary sub-market' of either the Basildon or Southend housing market. A clearer explanation of a 'secondary sub-market' should be provided together. Also, the implications of different parts of the Borough being associated with different housing markets should be elaborated.</p>

ISSDP159	Jamie Melvin	NATURAL ENGLAND		<p>Addition documents which should be considered as part of the evidence base include:</p> <ul style="list-style-type: none"> Essex Wildlife Trust's Living Landscapes Map of Essex; and Natural England and Essex Wildlife Trusts' Analysis of Accessible Natural Greenspace Provision for Essex (2009)
ISSDP165	GMPF	Thameside Metropolitan Borough Council		<p>GMPF agree with the list of documents which will form part of the evidence base for the new Local Plan. The list notes that the Retail Needs Assessment 2007 will be updated as a new <i>'Retail Needs Assessment Review'</i>.</p> <p>GMPF supports this approach. As a main landowner and investor in Canvey town centre, GMPF would welcome the opportunity to input into the review of the Retail Study and work with the Borough Council's consultants to identify the short and long term opportunities that may exist on the site to help improve the retail offer and environment in the town centre.</p>
ISSDP175	Mr Andrew Dutton	Persimmon Homes		<p>The evidence base is a vital and important component of the background information supporting a positive policy framework for the new Local Plan. The Council should ensure it is in compliance with paragraphs 158-162 of the NPPF. The evidence base produced as part of the withdrawn Core Strategy is still of relevant and was deemed by the Council to constitute a robust suite of studies underpinning the soundness of the submitted Core Strategy. In that context, I would expect the Council to place weight upon the existing evidence base which is an appropriate body of information which provided an objective assessment to support what the Council maintained was a sound Core Strategy.</p> <p>I propose that the following documentation is deemed formally to be part of the evidence base for the New Local Plan:</p> <ul style="list-style-type: none"> CS Topic Paper 1: Green Belt (May 2010) Core Strategy DPD (October 2010) The Annual Monitoring Report 2010/11 Briefing Paper for Members' Conference (September 2011) including related Appendices Sustainability Assessment of sites in the Castle Point Green Belt (Baker Associates, 19August 2011) Update to the Sustainability Appraisal of the Core Strategy Sustainability Appraisal Report (Baker Associates, October 2010) A Mid-Examination Response to the Revocation of Regional Spatial Strategies and Changes to PPS3: Housing (CPBC, September 2010)
ISSDP201	Mr Alex Cooper	RSPB	No	
ISSDP222	Mr Ivor Beamon	FLP Ltd		<ul style="list-style-type: none"> A Green Belt Review needs to be undertaken that principally focuses on the five purposes of the Green Belt as set out in PPG2 The Green Belt Review would also need to address the comments raised by the Inspector who conducted the previous CS Examination in his letter of the 11th May 2011. The Strategic Flood Risk Assessment needs to include an emergency evacuation strategy for Canvey Island. <p>Justification attached</p>

Question IDP21: Do you agree with the list of potential policy headings?

ID	Name	Organisation	Yes/No	Comment
ISSDP8	Dr Robert Spink		Yes	It is important to keep the overall character of the borough and so a number of middle to high range homes should be built along with the more affordable homes. The need is that affordable homes should be mostly for sale rather than rent in order to help our children to buy and stay locally. We are still one of the highest areas in Britain for home ownership and this should not be changed as it keeps our borough safer and with lower crime than average.
ISSDP55	Elaine De Can	Canvey Island Town Council	Yes	
ISSDP89	Miss Jo Hardwick	Environment Agency	Yes	<p>We are pleased that the proposed list of policy headings addresses a variety of environmental issues which will need to be considered for new development proposals. This includes:</p> <ul style="list-style-type: none"> Spatial Strategy: Principles of Sustainable Development; Coastal Change Management Areas; and Sustainable Development and Growth. Physical Infrastructure: Water Supply; and Wastewater Infrastructure

ID	Name	Organisation	Yes/No	Comment
				<ul style="list-style-type: none"> - Green Infrastructure and the Coast - Managing Risk: Tidal Flood Risk; Fluvial Flood Risk; Surface Water Management; Hazardous Uses; Developments near Hazardous Uses; Pollution; and Contaminated Land. - Sustainability: Water Efficient new build; Efficiency Improvements to existing buildings; Space for Segregated Waste Storage; and Managing Construction Waste. - Monitoring and Implementation: Developer Contributions/ CIL; and Monitoring.
ISSDP105	Rose Freeman	The Theatres Trust		<p>Unfortunately the provision of cultural services is not a statutory duty for local authorities. But the provision of venues for cultural activities (other than sport and open spaces) plays a crucial role in tackling social inclusion, contributes to regeneration, promotes safer communities, and provides opportunities for voluntary and community activity which stimulates lifelong learning, not to mention activities for young people.</p> <p>We suggest cultural activities regarding existing and future museums, libraries and centres for arts and crafts etc, should be included with the policy to 'Improving the Vitality of Town Centres' under the Economy section - not forgetting the evening economy in your main town centres.</p> <p>We note the old Fire Station in Hadleigh has been re-used as a community arts centre and hope that perhaps another town centre building may provide the base for a theatre group. It would be appropriate to include a policy for 'Community Infrastructure' to state that a community infrastructure facility which has reached the end of its useful life for its existing function, is re-used for another community function in preference to its being released for other development.</p>
ISSDP117	Felstead Road	Redrow Homes	Yes	Yes the headings cover the main issues within the Borough.
ISSDP126	East of Central Avenue	Redrow Homes	Yes	Yes, the list appears to be robust.
ISSDP135	Mr Richard Reeves		Yes	Yes, the list appears to be robust.
ISSDP152	Mr James Trimmer	PORT OF LONDON AUTHORITY	No	Whilst acknowledging that there is nothing in the document beyond proposed policy headings, the PLA considers that the future, safe, development of the terminals should be addressed within the New Local Plan - in accordance with the principles within the NPPF - rather than as at present appearing to focus exclusively on a solely negative approach to the management of risk and the limitation of nearby development. Whilst the PLA would not seek to exclude these issues and indeed considers them important within policy, the Government's approach is to encourage sustainable development and, as such, policies that allow for this at the terminals should be included.
ISSDP166	GMPF	Thameside Metropolitan Borough Council		GMPF supports the list of proposed policy headings and consider that they reflect the aims of the Local Plan approach to provide a practical framework.
ISSDP176	Mr Andrew Dutton	Persimmon Homes		<p>The Core Strategy DPD (October 2010) contained a section dealing with a flexible land supply and Green Belt. Whilst Policy SS2 of that version of the Core Strategy considered the safeguarding of the Green Belt, it did acknowledge that land in the Green Belt is exceptionally required to meet development needs, sites will be identified to accommodate such development that do not harm any of the strategic functions of the Green Belt at a sub-regional and local level. The Core Strategy acknowledged that it was not possible to accommodate all necessary development within existing urban areas and, as a consequence, recognise that it would be necessary to identify limited areas of land for release from the Green Belt to accommodate new housing. That pragmatic recognition of these issues does not appear to be incorporated within the potential policy headings.</p> <p>I have noted that two potential policy headings deal with 'meeting housing needs' and 'delivering affordable housing'. It is difficult to ascertain how these laudable objectives can reasonably/responsibly be met if the New Local Plan is based primarily upon the premise that the extent of the existing Green Belt is protected. I trust that the consideration of new development in the Green Belt identified at page 24 of the Discussion Paper will relate to the general position to be found in the Core Strategy DPD (October 2010).</p>
ISSDP202	Mr Alex Cooper	RSPB	Yes	
ISSDP213		Oikos Storage Limited		<p>Section 6 lists the potential policy headings and includes one on 'Hazardous Uses' and 'Development near Hazardous Uses'.</p> <p>Oikos understands the need to include policies under these headings. It will only become clear if these policies are acceptable once they have been drafted. In order that the policies are properly balanced, Oikos suggest that consideration needs to be given to the terminal's national economic importance and the need for it to respond to changing energy market conditions. Such policies must also be carefully worded to provide adequate comfort to the community but should not be unduly or unreasonably restrictive on the operation of the terminal beyond the requirements of the regulators. Oikos anticipate that any policy relating to development within the vicinity of such uses would refer to the use of the PADHI methodology and the need to rely on advice from the HSE.</p>

Question IDP22: Do you think any other potential policy headings should be included?

ID	Name	Organisation	Yes/No	Comment
ISSDP31			Yes	In order to ensure that decisions on planning applications take into full account equality considerations, an equality checklist should be included within the New Local Plan. This will help the Council respond positively to the requirements of the Equalities Act.
ISSDP56	Elaine De Can	Canvey Island Town Council	No	
ISSDP90	Miss Jo Hardwick	Environment Agency	Yes	There are some additional policies which we consider need to be included in the New Local Plan: - Water Quality: A policy should be included to ensure there is no deterioration in water quality and to ensure that opportunities are taken to improve water quality. It should link to the objectives of the Water Framework Directive, Habitats Directive, Shellfish Directive and Bathing Waters Directive. This links to both the Wastewater Infrastructure and Pollution topics already listed in your consultation document. - Natural Environment: A policy is required which will ensure the protection and enhancement of biodiversity in the District. This should include aquatic species as well as terrestrial.
ISSDP144	Mr Roy Lewis	Essex County Council		The following matters will require specific consideration within the current headings, <ul style="list-style-type: none"> • safer routes to schools • post sixteen/vocational skills and training (as a key issue for tackling deprivation in the Borough and particularly on Canvey Island)
ISSDP160	Jamie Melvin	NATURAL ENGLAND		The potential policy headings are extensive and look to be comprehensive. In regard to "The Spatial Strategy", Natural England would hope to see a strategically planned ecological network comprising the broadest range of high quality green spaces and other environmental features is threaded through the plan connecting the urban areas to the Borough's highly recognised natural assets. The proposed titles of the sub heading provide the opportunity to pursue this. There may be benefit in the addition of a sub heading under the heading "Green Infrastructure and the Coast" to set out policies in relation to the Nature Improvement Area.
ISSDP203	Mr Alex Cooper	RSPB	No	
ISSDP214		Oikos Storage Limited	Yes	Oikos considers that the heading "Strategic Context" is missing and should be added to the list of contents. The demise of RSS requires the local plan strategy to be validated by reference to NPPF and to other relevant national policies, including those for Ports and Energy. The heading "Physical Infrastructure" should be amended to read "Physical and Economic infrastructure, and include a sub-heading "Energy Infrastructure". The Oikos terminal is part of national energy infrastructure. The National Policy Statement for Energy acknowledges the need to ensure safe and secure supplies of oil products and in turn the importance of reliable infrastructure including pipelines and import terminals. In order to be consistent with Government guidance Local policy should provide adequate protection for such energy infrastructure. Whilst there is no need to change the sub-heading "Transport", it must be interpreted to include ports.

Question IDP23: Do you think certain types of infrastructure provision in Castle Point should be prioritised?

ID	Name	Organisation	Yes/No	Comment
ISSDP57	Elaine De Can	Canvey Island Town Council	Yes	Highways and Transport, Flood Risk Management, Drainage, Leisure Facilities, Community Halls and Youth facilities and services.
ISSDP91	Miss Jo Hardwick	Environment Agency	Yes	We consider the provision of both flood risk management and drainage infrastructure should be prioritised. Given that most of Canvey Island lies at, or below, the level or mean spring tides in the adjacent estuary, maintaining the continuity and standard of the Thames tidal flood defences is critical to both existing and new development and the overall sustainability of the island. The draft TE2100 plan recommends the defences are upgraded to keep up with climate

ID	Name	Organisation	Yes/No	Comment
				<p>change but there is no guarantee that central funding will be available in the future to undertake these works. The Community Infrastructure Levy (CIL) should therefore make provisions for contributions from new developments which can help with the delivery of the upgrades. It should also make provisions for maintenance of the defences. We suggest that the publication “ <i>Flood and Coastal Resilience Partnership Funding</i>” is referred to to help us provide future defences in the context of the TE2100 Plan’s policy aspirations for the island.</p> <p>The TE2100 also advises that habitat creation will be required on the Estuary to replace inter-tidal areas lost through climate change. This should also be recognised in the CIL.</p> <p>Surface water drainage infrastructure will also require upgrades to prevent future flooding from fluvial and pluvial events. It also requires regular maintenance (vegetation clearance, addressing of siltation, blockage removals, etc) which should be addressed as part of the CIL. The draft South Essex Surface Water Management Plan also identifies some preferred options which are needed to address issues in the identified Critical Drainage Areas to which CIL contributions could be sought.</p> <p>The list also mentioned the provision for ‘Open Space and Playgrounds’ and ‘Public Realm Improvements’. We suggest this addresses green infrastructure more generally which as the benefits of providing multiple benefits such as habitat creation, water quality improvements, surface water drainage etc.</p>
ISSDP106	Rose Freeman	The Theatres Trust		Please amend the list on page 26 to Leisure and Cultural Facilities.
ISSDP167	GMPF	Thameside Metropolitan Borough Council		<p>GMPF recommends the Council considers very carefully whether to include new retail floorspace in any future Community Infrastructure Levy (CIL) charging schedule. GMPF advises the Council to consider the approach Shropshire Council took in respect of new commercial floorspace, which was excluded from the burden of CIL. This approach was taken to encourage investment in its town centres.</p> <p>In summary, the Knightswick Centre remains the largest retail asset in Canvey town centre; its position and role should be recognised in the new Local Plan.</p>
ISSDP223	Mr Ivor Beamon	FLP Ltd		<ul style="list-style-type: none"> Flood Risk Management Infrastructure needs to be prioritised in order to create safe and sustainable communities. Highways and transport is also an important form of infrastructure that will need future investment. This is required in order to provide efficient links between Canvey Island and the mainland. It will also make the Borough a more accessible location. <p>Justification attached</p>

Question IDP24: Are there any infrastructure projects that should be included within the infrastructure schedule for Castle Point?

ID	Name	Organisation	Yes/No	Comment
ISSDP58	Elaine De Can	Canvey Island Town Council	No	
ISSDP92	Miss Jo Hardwick	Environment Agency	Yes	<p>We recommend that you have discussions with Anglian Water and Essex and Suffolk Water to determine where water infrastructure (clean and foul) is required and the appropriate funding mechanism for that infrastructure. Your Water Cycle Study indicates the development can not take place in some locations until upgrades are provided.</p> <p>Further, we draw your attention to Regulation 17 of the Water Environment (WFD)(E&W) Regulations 2003 which places a duty on each public body, including local planning authorities, to ‘ <i>have regard to</i>’ river basin management plans (RBMP). Development should support the Anglian RBMP actions to protect/improve water quality so we recommend you consider where WFD improvements may be possible within the area and whether these could be aided by CIL funding.</p>
ISSDP145	Mr Roy Lewis	Essex County Council		A Borough transport study would assist in identifying the strategic transport related infrastructure and services required to support the New Local Plan, with local requirements identified through Transport Assessments.
ISSDP204	Mr Alex Cooper	RSPB	No	

Question IDP25: Were you satisfactorily advised of this consultation event?

ID	Name	Organisation	Yes/No	Comment
ISSDP59	Elaine De Can	Canvey Island Town Council	Yes	
ISSDP70	Mr John Hall			<p>First time that I have seen this portal well done on its creation and a tremendous step in democracy. Big problem is how to engage far more people. If comments listed are all that exist far more selling of the facility is highly desirable.</p> <p>Some further development of the portal to allow comments to be added to other peoples would be useful.</p> <p>One of the things missing from the plan is a vision for Castle Point. Once that is agreed you can then set targets and develop a plan to implement the targets. Suspect this is a plan without any clear purpose!</p> <p>Consultation would be far better drip fed as items are developed. Very difficult to consult when so much work has already been completed - appears rather too late! Problem is consultation is included as an add on rather than essential part of creation!</p>
ISSDP93	Miss Jo Hardwick	Environment Agency	Yes	We got notified of this consultation through Stuart Rickards who is now the Planning Liaison team leader. It would be helpful if future consultations are submitted to the current Planning Liaison Officer for South Essex, Jo Hardwick, by emailing jo.hardwick@environment-agency.gov.uk .
ISSDP107	Rose Freeman	The Theatres Trust		Very satisfied
ISSDP205	Mr Alex Cooper	RSPB	Yes	

Question IDP26: Have you been satisfied with the mechanisms available to respond to this consultation event?

ID	Name	Organisation	Yes/No	Comment
ISSDP60	Elaine De Can	Canvey Island Town Council	Yes	
ISSDP94	Miss Jo Hardwick	Environment Agency	Yes	Yes, we felt the consultation questions allowed us to make the points we needed to.
ISSDP108	Rose Freeman	The Theatres Trust		Very satisfied
ISSDP206	Mr Alex Cooper	RSPB	Yes	

Other Responses

ID	Name	Organisation	Yes/No	Comment
ISSDP95	Sue Bull	Anglian Water		Thank you for the opportunity to comment on this document. However, I have no comment to make at this time.
ISSDP146		Sainsbury's Supermarkets Ltd		<p>Sainsbury's currently operate two stores in the Borough at the Knightswick Centre in Canvey Island and at Stadium Way in Rayleigh Weir. Sainsbury's have aspirations to improve their representation in the Borough, and are therefore, keen to be involved in the LDF process.</p> <p>The SWOT analysis identifies the potential 'threats' associated with the opening of the Westfield Stratford shopping centre and the existing retail provision within the neighbouring centres. All of which are identified as a draw for Castle Point Residents.</p> <p>However, there is no reference within the 'weaknesses' of the current situation that exists in terms of the Borough's retail provision. It is relevant that the Borough's centres are constrained in terms of their development opportunities and as the threats acknowledge, there is significant leakage to competing centres outside of the Borough. The constraints are evident in that the existing site configuration of the Sainsbury's store at Knightswick, Canvey Island is limited in terms of design solutions and opportunities to expand and improve the retail environment, in order to better retain local expenditure.</p> <p>The Discussion Paper highlights the town specific issues of four main areas within the Borough. It recognises Sainsbury's presence in Canvey Island as one of the town's main anchors. From our previous discussions with the Council, it has been acknowledged that Canvey Island town centre suffers from a lack of good quality retail units of a size desired by modern retailers.</p> <p>Through the New Local Plan, the Council should embrace opportunities to encourage expansion of existing retail units or facilities which will contribute towards achieving a healthy level of clawback of local expenditure, and to address 'weaknesses', such as the quality and size of retail units available in the centre.</p> <p>It is clear that the Council are relying on considerable levels of housing provision within the town centre which may further constrain the centre's ability to accommodate a reasonable scale of growth in retail floorspace. We consider that the policies should balance plans for the delivery of this housing growth within the centre, against encouraging retail development that will increase the attractiveness and the vitality and viability of town centres.</p> <p>The New Local Plan should take a pragmatic and innovative approach toward encouraging regeneration of the Borough's town centres, such as Canvey Island. In doing so, the emerging policies must recognise the existing weaknesses of the centres and promote steps to encourage valuable investment within them. That investment will assist in addressing these weaknesses and encourage the delivery of new retail floorspace, in order to retain higher levels of local expenditure.</p> <p>We trust that the above comments will be taken into consideration in the preparation of the New Local Plan. Sainsbury's are keen to invest further in the retail offer of the Borough and we trust that our representations on this matter will be taken into account.</p>
ISSDP147	Mr James Trimmer	PORT OF LONDON AUTHORITY		<p>Thank you for consulting the Port of London Authority on the above document. As the Council is aware, the PLA owns the freehold of a substantial landholding in South West Canvey, centred on the Oikos Terminal and surrounding land. The Council will be further aware from the progress of the previous Core Strategy that the position of the PLA - as owner of this terminal and adjacent land - remains that it has no proposals or interest in the use or redevelopment of its holdings for anything other than cargo-handling uses in accordance with its statutory duties.</p> <p>Both the Oikos and the adjacent Calor Terminal are long-standing and important terminals within the Port of London and have excellent deep water jetty access. The channel that passes these terminals is currently being deepened as part of the dredging works for the nearby London Gateway development, which will offer increased opportunities for future operations at these terminals. The landward access to national pipeline networks provides a sustainable distribution mode for the products handled at the terminals; which themselves are of national importance to the UK's economy.</p> <p>The current lessees of the Oikos terminal have undertaken considerable work to upgrade the facilities available, both onshore and on the jetties. The Council's recent consideration and subsequent approval of Oikos' application for a new Hazardous Substances Consent (HSC) at the site will bring significant improvements to risk and safety at the terminal.</p>
ISSDP224	Mr Jack Tring			<p>Introduction</p> <p>I have written this without seeing the New Local Plan Issues Paper. I have now read it and in the main agree with your questions but am not altering my submission as I have used a couple of new headings and perhaps a new approach.</p> <p>As I understand it, CP is starting with a blank sheet on housing policy and residents are asked to give their views.</p> <p>Accordingly I am trying to analyse the situation under a number of connected headings particularly with regard to housing, employment, roads and the elderly</p> <p>It seems to me that, although the mainland and Canvey are different situations, particularly with the egress problems of Canvey, the costs of travel to work and the flooding threat,</p>

ID	Name	Organisation	Yes/No	Comment
				<p>there is a strong common view that they don't want any more housing developments. Steve Walker, director at Allen and Morrison, Urban Practitioners, highlighted the dilemma when he said, "there was too much space around Hadleigh Library"</p> <p><i>Is someone saying there is too much space in CP?</i></p> <p>All residents want the general environment and open spaces to be protected. Many residents escaped from London for the "good life" and they do not want a copy of London here.</p> <p>The elderly</p> <p>This is a hot topic, not just for me but also David Cameron who made a speech on reported on the front page of the Daily Telegraph of February 10 2012.</p> <p>The headline is "Elderly told to go back to work and downsize"</p> <p>We want to live in our own homes as long as possible and we need to ensure that all new homes are built to Lifetime Homes standards. However if we have to downsize, suitable homes must be available.</p> <p>The proportion of elderly is rapidly increasing, they are living longer, their future pensions are rapidly decreasing, and only one in twenty have set aside savings for their care in old age, thus they will not be able to afford a move later in life.</p> <p>A lot is being done in the social housing sector in CP, but the private sector needs a lot more attention. Care homes are not the answer for a lot of the elderly. We don't all want to live in one or can afford to do so. There seem to be rather a lot of these coming before the development control committee and apparently the councillors jibbed at the last application.</p> <p><i>How many lifetime homes do we have on the mainland?</i></p> <p><i>How many lifetime homes do we have on Canvey?</i></p> <p><i>How many care home places do we presently have on the mainland?</i></p> <p><i>How many care home places do we presently have on Canvey?</i></p> <p><i>How many nursing home places do we have on the mainland?</i></p> <p><i>How many nursing home places do we have on Canvey?</i></p> <p><i>How many care home and nursing home places are in the pipeline ?</i> I know the old Essex CC Social Services site is standing idle.</p> <p>The Essex CC response to the SPDG paper on Canvey said the Masterplan should make reference to delivering all housing to a Lifetime Homes Specification with 10% being wheelchair accessible. They obviously regard this as consistent with all the data available on the increase in the elderly population.</p> <p>The current Local Plan Policy H11 is not adequate . "encourage" should be replaced by "require" The use of "encourage" indicates that you are not taking the problem seriously and you are not in tune with the current situation</p> <p>Flooding on Canvey could be a greater problem for the elderly, because of their limited mobility and raising of floor levels above ground level in new properties.</p> <p>Existing Social housing</p> <p>Apparently the current social housing list contains about 1300 names, how realistic is this list?</p> <p><i>What criteria do the council use for allocating housing?</i></p> <p><i>What is the breakdown of housing types? 4 bed, 3 bed, 2 bed, 1 bed, houses, flats, bungalows, specially adapted flats and houses etc</i></p>

ID	Name	Organisation	Yes/No	Comment
				<p><i>Where are the locations? I.e. Canvey or mainland?</i></p> <p><i>What is the similar breakdown of housing requirements?</i></p> <p><i>Where do applicants work? How many are unemployed? Etc</i></p> <p>New social housing</p> <p>New social housing seems to divide into rented social housing, subsidised mortgaged "affordable housing" and subsidised rented "affordable housing".</p> <p>There are often a lot of multi-storey flats in social housing: I am not sure this gives a good quality of life, especially for children</p> <p>The David Wilson project will probably produce 30 units (20% of 150, assuming no subsidies (as in the last application) Flats or houses?</p> <p>Hadleigh Town Centre Masterplan envisaged 7 houses and 120 flats (Mark Evershed) giving 1 house and 24 flats at a 20% social housing unsubsidised rating.</p> <p>Canvey Town Centre Masterplan envisaged 400 units but at the last SPDG meeting the Canvey councillors demanded this be reduced to 250 units. At the 20% social housing unsubsidised rate this equates to 50 units. Flats or houses?</p> <p>Persimmon are proposing 312 units on Canvey made up of 215 private and 111 "affordable", this probably assumes a 35% subsidised contribution which could reduce to 20%, giving 62 "affordable" units. Flats or houses?</p> <p>Existing private housing</p> <p>The vast majority of housing resources are already built and this seems to get ignored by the council.</p> <p>I have heard there are 1000 empty properties in Castle Point. Is this correct? If true, this complicates the situation and also we do not know how many potential buyers are out there with sufficient deposit to put down on a private purchase.</p> <p><i>Do we know the breakdown of property types available e.g. Canvey or mainland, 4 bed, 3 bed, 2 bed, house, bungalow or flat, parking provision, suitability for the elderly etc?</i></p> <p>New private housing</p> <p>Large developments only considered here</p> <p><i>Are we in competition with adjacent councils? If Rochford passes plans for 600 houses, as they have done, have we got to do the same?</i></p> <p><i>Does the council need to increase the rates income?</i></p> <p><i>Who says we need any new private housing? Where is the evidence? I have heard councillors at planning meetings ask this</i></p> <p><i>Although the government have dropped the "Gordon Brown boom and bust mode" is there still a wish to apply it locally?</i></p> <p><i>How do we assess if new homes are needed?</i></p> <p><i>Should there be a private housing list?</i></p> <p><i>Where are the potential purchasers coming from? Local or further afield? I heard a comment at a local meeting that we don't want any Londoners here.</i></p>

ID	Name	Organisation	Yes/No	Comment
				<p><i>A good proportion of residents originate in London!</i></p> <p><i>Is this the only way to get affordable housing?</i></p> <p><i>How many potential buyers are there with the necessary deposits?</i></p> <p><i>Is existing housing stock taken into account in any way?</i></p> <p><i>Is local employment opportunity taken into account in any way?</i></p> <p><i>Are specifications considered sufficiently?</i></p> <p>Hadleigh town centre gives about 100 new units, mainly flats.</p> <p>Canvey town centre gives about 200 units, breakdown unknown, but probably mostly flats</p> <p>Both these Master plans probably have a long time span before work starts but Persimmon appears to be pushing ahead. .</p> <p>Persimmon is proposing about 215 units on Canvey. Flats or houses?</p> <p>The Thorney Bay development proposal seems to be active and for about 600 units total.</p> <p>Jotmans Farm and Daws Heath seem to be in the background.</p> <p>Existing employment</p> <p>There doesn't seem to be much connection between housing and employment . <i>Should there be?</i></p> <p>Huge numbers of commuters, but travelling costs rising fast. Lots of small employers, mainly on factory estates. Lots of self-employed tradesmen, travelling widely</p> <p>Lots of shop employment including three large supermarkets and several smaller ones.</p> <p>Castle Point Council</p> <p>A variety of schools</p> <p>New employment</p> <p>There doesn't appear to be the possibility of a great expansion of work within the borough . <i>Are we to encourage even more commuting?</i></p> <p>All the local boroughs, even Southend, seem to quote the DP World port at Thurrock as the source of new employment which is said to give an increase in demand for housing, with 12000 jobs in the short term lot of road. Trade is said to be boosted by £3.2 billion a year but whether imports or exports is not made clear and the recession is slowing things down.</p> <p>A Thames airport at the Isle of Grain could be important, especially as a link road to the A12 is proposed, except that CP might be bypassed (see also railways)</p> <p>Essex CC is very backward in promoting new employment, they should be much more active in promoting business parks more centrally near the existing road network and not rely on the Thames Gateway, Thurrock, Lakeside or the Isle of Grain Airport.</p> <p>A new Thames Airport could have a very harmful effect on employment at Stansted, but very beneficial to those living near the Thames, links permitting.</p> <p>It is not clear what effect Roscommon Way will have on employment. Local councillors say it will have little effect.</p>

ID	Name	Organisation	Yes/No	Comment
				<p>Superfast Broadband</p> <p>I have given details of £550 million government funding on offer to Cllr. Brunt, who has forwarded it to the Chief Executive and Mark Evershed.</p> <p>Southend is applying for some of this money and no doubt other towns in Essex</p> <p>As we are looking to the future, the effect of the web on employment and shopping in CP needs a review. At present, one can sit at a PC and purchase virtually everything, but in the future the same will be done by smartphone.</p> <p>Web based businesses should be encouraged in CP, they don't necessarily require large premises but they do require superfast broadband.</p> <p>Good IT apprenticeship training is available in Essex for prospective employees.</p> <p>Existing roads</p> <p>Assuming one car per unit, the Hadleigh Masterplan could contribute a 150 or more car increase. The proposed road changes in Hadleigh, including a pedestrian precinct could give the residents a higher quality of life, although may give a lower quality for through traffic.</p> <p>At one car per unit, the Canvey Masterplan could contribute a 250 car increase. This could cause congestion on Canvey's roads and more pressure on getting on and off the island, hence lower quality of life.</p> <p>With regard to the David Wilson project, it was thought that the Barratt plans would not increase road congestion on the A13, but plans to reduce through traffic in Hadleigh may change this view.</p> <p>The Persimmon project of 312 units must cause congestion on Canvey and increase problems getting on and off the island, hence give a lower quality of life.</p> <p>Heavy congestion exists in peak periods in term time on the Kiln Road, Rayleigh Road and through Hadleigh.</p> <p>Rayleigh Road is very busy at all times due to the Kenneth Road-Hart Road rat run between the A13 and the A127 via the Woodmans junction. If the pedestrian precinct model is adopted for Hadleigh a lot of Southend-bound traffic will turn left into the Rayleigh Road and increase the congestion.</p> <p>Sadlers Farm project is almost finished. It will make it easier to go through the area but not sure about effect on local employment.</p> <p>Hadleigh Masterplan suggests a pedestrian precinct in Hadleigh, which may cause congestion. Need for Southend traffic to be rerouted at Sadlers Farm, or Vic House corner.</p> <p>New roads</p> <p>The Foster Plan for a Thames Estuary Airport has a link road between the A12 and Kent, which he calls the Lower Thames Crossing. If built, this could have a major impact on this area in terms of employment and congestion. The obvious connection to the A12 is the A130, which would affect Canvey.</p> <p>New railway</p> <p>A rail link across Essex to the airport would be greener and better</p> <p>Huge subsidies are given to rail travel in London. Essex needs to get on the bandwagon for a cross-county rail link through a tunnel if the proposed Thames Airport looks like getting approval. A four-track railway is proposed in Kent linking the airport to London.</p> <p>Conclusions</p> <p>An urgent review of all aspects of dealing with the elderly is needed</p> <ul style="list-style-type: none"> • Some new council procedure or committee needed to take stock of all housing, both old and new in conjunction with employment opportunities. • The present system of asking developers to build a proportion of social and affordable housing is not going to deliver the goods; the housing list will remain very long on this

ID	Name	Organisation	Yes/No	Comment
				<p>system. Some other way has to be found</p> <ul style="list-style-type: none"> • It seems that a major increase in commuting will occur with any new development. What can be done about it? • If the Thames Airport on the Isle of Grain is approved with a rail link to Essex we need a local station. • A decision needed on whether CP is at saturation point or not. If at saturation point, maybe other local authorities are not.
ISSDP225		Calor Gas Limited		<p>Calor has read the Consultation Leaflet and Issues for Discussion Paper and wishes to make the following representations:-</p> <p>1) As was set out at the Examination into the Core Strategy, Calor intends to continue the existing LPG operations at the terminal and has no plans to cease operations or dispose of the site. Indeed, the site is a key component of Calor's core business, supplying LPG to homes and businesses across the UK. The site is now of increased importance to Calor following the closure of its LPG facility at Felixstowe in 2009.</p> <p>2) The existing LPG terminal is a strategically important asset, not only in terms of Calor's core business, but also for the UK as a whole, supplying LPG to homes and businesses across the country. The importance of retaining such facilities is clearly set out in national energy and ports policy. In particular, national energy policy promotes a diverse and flexible range of supply infrastructure, (including terminals served by ship), and fuels as a means of ensuring the future security of UK energy supplies. It also recognises that LPG is an important fuel source, not just to homes and businesses that are not connected to the gas network, but also the transport sector. Furthermore, ports policy promotes the best use of existing port facilities, such as those at Canvey Island which lie within the Port of London Authority area, and recognises the important role of ports in the supply of energy to the UK, helping to underpin energy security.</p> <p>3) Currently there are only 8 refineries supplying the UK LPG market whereas there used to be 15, which included the Shell Haven refinery, Calor's primary source of LPG for the south east prior to its closure. In addition, there used to be 3 rail LPG supply terminals, which have all now closed, together with the only petro-chemical complex supplying LPG. Furthermore, as stated above, Calor's Felixstowe facility had to be closed in June 2009 due to compulsory purchase of the site. As a result of these developments, the strategic importance of retaining the Calor terminal for LPG supply security is now even greater.</p> <p>4) Calor is concerned that both the Consultation Leaflet and the Issues for Discussion Paper (Section 2.4) identifies the Calor LPG terminal (and the Oikos terminal) as 'threats'. While there are risks associated with hazardous installations, these are strictly regulated under the Control of Major Accident Hazard (COMAH) Regulations 1999 (as amended). Furthermore, the Calor terminal has a very good safety record and a long history of safe operation for gas-related uses. We do not, therefore, consider that it is appropriate to identify the Calor and Oikos terminals as 'threats' to the borough.</p> <p>In summary, Calor remains committed to the continued operation of the LPG terminal on Canvey Island, which is critical to its core LPG business. Continued operation of the terminal is also in the national interest, as it represents strategically important infrastructure that contributes to the diversity and security of UK energy supplies.</p> <p>The New Local Plan for Castle Point should recognise that the Calor terminal will remain a feature of Canvey Island for years to come and that it is of national importance.</p> <p>The New Local Plan should also include appropriate policies in respect of any proposals for development within the Consultation Zone associated with the Calor terminal. These policies should be based upon the Health and Safety Executive's land use planning guidance.</p> <p>Calor wishes to engage with the Council to ensure that the New Local Plan results in an appropriate development strategy for Canvey Island and would be very happy to meet with relevant officers to discuss these representations in more detail if that would be of assistance.</p>
ISSDP228	Mr Ian Harding			<p>Castle Point Council spent 5 years and £477,000 of taxpayers money, compiling a Core Strategy, to justify a figure of 5,000 new houses being built in the borough by 2026.</p> <p>This figure was imposed on you by the previous government and seems to be encouraged by the current coalition.</p> <p>The powers that be in the council, originally tried to put most of these new houses on Canvey, but when the residents objected, were forced to look at sites on the mainland.</p> <p>Castle Point is nearly 5 times more densely populated than the average Essex population density.</p> <p>According to the Castle Point District Profile, we have 89,200 people living in 45 sq.km.</p> <p>That means there are 1,978 people per sq. km. compared to the Essex average of 404 people per sq. km. (China only has 139 people per sq.km!)</p> <p>5000 new homes could potentially add an additional 15,000 people to the borough (a 17% population increase) taking our population density up to 2,116 people per sq.km.</p> <p>The infrastructure is nearly at breaking point, as you cannot fail to see with the current farcical 'improvements' being made to the Sadlers Farm roundabout. Anyone who has tried to drive through the borough recently, has had to sit in the traffic chaos caused with just the existing population trying to get to work, earn a living and contribute to the borough. God knows how much worse this will be if you get your way and add another 15,000 people to Castle Point alone?</p>

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				<p>We are already having human sewage taken out of the borough in tankers and delivered to larger treatment plants in Basildon. I have witnessed this for my own eyes in the high road, outside Jotmans School at 8.30am in the morning!</p> <p>The Council spent 5 years compiling a Core Strategy that the majority of residents that I have spoken to, knew nothing about.</p> <p>The recommendations of this would have allowed developers to build up to 900 houses on green belt land at Jotmans Farm as well as thousands of houses on green belt land on Canvey, Daws Heath and Glebelands to name just 4 of the 48 sites that had been identified for possible development.</p> <p>This Core Strategy was put forward for the Council to 'rubber stamp' on 27th September 2011 giving developers the right to begin submitting development plans within weeks.</p> <p>With the government's 'presumption in favour of sustainable development, and the new incentives announced in the budget there is a very good chance that these developments will go ahead.</p> <p>One local resident found out what was about to happen and realised the implications 6 days before this meeting and together with a small number of other residents, in just 3 days, managed to get 2,500 signatures on a petition and more than 500 people to march on the Council offices to show their disgust.</p> <p>Thankfully the Core Strategy was kicked out and we now have the chance to reassess our local development need, which is supposedly what you are doing via this consultation process?</p> <p>What is our real need?</p> <p>According to the Castle Point District Profile, Castle Point has an ageing population, who are living longer, with fewer working-age people in the borough than the English average.</p> <p>This will have a significant impact on the future provision of health & social care in the district. By 2030, Castle Point will have a lower proportion of people in every age category under 54 years old, and a much higher proportion of over 55's.</p> <p>Our REAL need is to create planning initiatives that look after our elderly residents. If we are responding to local need, we should be building retirement communities with eco-friendly buildings, with solar panels, proper insulation, triple glazing etc, that allows and encourages our elderly residents to leave larger homes, releasing some of their equity (as our pension system is in such bad shape) to live in a community which has its own health and social care services, entertainment and shops, with car pools, which mean they do not have to pay to run and maintain expensive cars.</p> <p>Energy efficient houses/bungalows in these communities would significantly reduce their crippling living costs, allowing them have an enjoyable, safe, secure and affordable retirement. These communities (prevalent in Florida) would remove the stigma of sheltered accommodation and care homes and would become places that people actually aspire to live in.</p> <p>This would create a natural flow of people through property in the borough, (once the economy is able to allow banks to lend again) letting everyone move up a level, freeing up property for the generation behind them.</p> <p>Notwithstanding the obvious ownership complexities, Manor would be an ideal location for a development like this, and would have the added benefit of removing all of the lorries from Tarpots.</p> <p>Kings Park has actually gone a long way to showing the potential of this type of community living on Canvey. The only downside (depending on your point of view) of Kings is that it encouraged a big in-migration of people from London, which obviously increases our density figure.</p> <p>These types of ideas are not being thought of, looked at or discussed as all of this development is driven by profit, not local need. It's much more profitable to stick as many 4 bedroom homes as possible, on land that is financially worthless i.e. Green Belt, than build residential communities with affordable eco-friendly housing.</p> <p>The bigger picture</p> <p>Having walked around London last week by The Shard in SE1, it became blindingly obvious what is actually going on with all of this proposed development being inflicted upon us.</p> <p>Property prices in London have risen year on year for as far back as I can remember. With political uncertainties across the world, the economic boom happening in India, Asia and Russia, London has become an even more desirable place to live.</p> <p>There is no shortage of extremely wealthy people queueing up to move into the capital. But there is one thing holding them back at the moment. Like Castle Point, London is too densely populated. With a population of 7,825,200, it is the most populated city in the European Union.</p> <p>Many of the people living in London presently are not as affluent as those seeking to move there, so as part of what appears to be the coalition government's bigger economic picture, these people are being 'encouraged' to move out.</p> <p>The first part of this strategy is to put a cap on housing benefit, making it financially impossible for many people to remain in London.</p>

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				<p>But as we are not a barbaric race, the government has to provide alternative housing for these people to 'move out' to. And that is where we, and surrounding areas like Southend, Basildon and Rochford come in.</p> <p>Our virgin green belt land within an existing infrastructure, is the perfect place to build thousands of 'affordable' houses to cope with the inevitable London exodus, regardless of the consequences and effects on the lives of people already living here.</p> <p>In order to 'soften us up' we are being fed a guilt story that our young people have nowhere to live and that there are over 1000 people on the housing waiting list. Whilst this may well be true a simple solution to this is to bring back into use the 1,250 empty properties (according to C4's great property scandal) that currently sit idle in the area. This could be done by financial penalties or incentives, as one councillor told me that there is a £1 million grant available to people refurbishing empty properties for rental purposes, which are then let out for a minimum of 5 years.</p> <p>Flawed evidence</p> <p>The proposed Core Strategy was based on evidence from the STRATEGIC LAND AVAILABILITY ASSESSMENT (SHLAA) and the STRATEGIC HOUSING MARKET ASSESSMENT (SHMA)</p> <p>I and a number of other residents have read the SHLAA, which is a 129 page document!</p> <p>It does not show a clear and obvious need to build such a large number of additional dwellings in our borough.</p> <p>And to compound this, the most recent SHLAA update, published on 24th October 2011, (4 weeks after the Core Strategy was kicked out) has changed the original 5000 figure and now lists a figure of 7,612, with many of the proposed sites still identified as green belt.</p> <p>The Council have seen how strongly residents feel about building such a large number of houses in the borough, but still seem to be pressing ahead with a strategy trying to justify it.</p> <p>The new Localism bill, given Royal assent on 15th November 2011, is meant to give more power to local communities and residents, allowing them to take greater control of key local issues, including planning, but apart from this current, weak and biased consultation process, the council has failed to properly present and involve residents in the reassessment of evidence and need.</p> <p>Financial incentives</p> <p>As mentioned, Castle Point already has 1,250 empty properties which need to be brought back into use and, according to a well respected local resident (a retired Chartered Surveyor) we already have total land availability within the urban area for 2,765 further houses without utilising currently "safeguarded land" or any further greenfield or green belt.</p> <p>The New Homes Bonus, devised by the government to encourage local councils to develop housing, will match fund the additional council tax raised for new homes for the following six years after each new property is built. An obvious incentive to the council to build, which would not be a problem if we had the space, capacity and infrastructure to do so. But as I said at the start of this letter, we are already 5 times more densely populated than the Essex average and are already at breaking point!</p> <p>With Council Tax frozen again this year, The Essex County Council's Pension Fund £1,175 billion in the red (as reported in the local press) and Section 106 and Community Infrastructure Levy money available for new developments, the cynic could assume there was an ulterior financial motive driving this desire to develop?</p> <p>Planning is a very emotive issue and it's easy to use the threat of building on green belt as a distraction to make the option of building on Brownfield sites seem like an acceptable solution.</p> <p>The Council have failed to provide simple clear compelling evidence that demonstrates the need for development.</p> <p>You have failed to respond to various submissions made to you to prove the need is there.</p> <p>You have failed to communicate and involve residents properly in the most important and life changing issue they face. A few 'coffee mornings' and school meetings where local councillors did not bother to turn up, and a weak consultation leaflet do not reflect the seriousness and importance of making people aware of the real issues.</p> <p>You have private meetings behind closed doors, with land owners and developers, which breeds mistrust and cynicism.</p> <p>You are looking again at the discredited evidence that was used to compile the now defunct Core Strategy, as opposed to throwing it out and re-evidencing from a blank sheet of paper.</p> <p>And you seem intent on ruining the character of the borough for what appears to be financial gain.</p> <p>One of your councillors went on radio and used local publications to, 'bribe' residents with the promise of a 'quick buck' if they identify Brownfield sites, sell off half their gardens or give up their garages!</p>

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				<p>The need for additional development has NOT been proved, it is NOT wanted and is NOT necessary.</p> <p>You have a chance to protect the character of our borough and safeguard the quality of life of the local residents who elected you. It's time to stand up and be counted, I hope you are all up to the task.</p>