

Dame Rebecca Harris DBE MP – Matter 1 Examination Hearing Submission

(Hearing held by Inspectors Mike Worden and Catherine Carpenter)

Thank you, firstly can I thank you Sir and Madam for allowing me to speak first so I can return to Parliament to represent my residents in the House of Commons this afternoon. I understand this is supposed to be a roundtable discussion and I am grateful, for you allowing me to speak at the beginning of proceedings.

I also wish to put on record that I have been asked to represent Canvey Town Council, Castle Point's only parish level Council at this hearing whose concerns about the huge amount of housing planned for Canvey and wider Castle Point echo my own.

Thank you also for the written clarification sent through the Programme Officer. You have made clear that the Green Belt sites listed on the agenda are **examples only**; that you are not examining the soundness of individual allocated or omission sites at this stage; and that it is the Council's approach to preparing the Plan that you are testing. I will keep my comments within those boundaries.²⁰

Sir, Madam, I want to be clear about what my case is on behalf of the residents of this Borough.

You will be relieved to hear I am not going to waste the hearing's time by talking about the huge problems I have with the Government's choice of determinants behind their current housing need target for Castle Point. Unfortunately for my residents that argument was lost at the 2024 General Election.

I am also not going to argue that Castle Point does not need any new homes. Young people who grow up here need somewhere they can afford to live.

But the Government dictated housing need and the final housing requirement are not the same thing. Government guidance says housing need is unconstrained and the Standard Method formula does not itself produce the housing requirement.²

That distinction is fundamental in Castle Point.

The Government's formula can produce a housing number. It cannot widen the A13, create another route off Canvey or add capacity to our antiquated drainage network.

The question before you is whether the adverse impacts of trying to accommodate all 11,662 homes significantly and demonstrably outweigh the benefits. Based on my experience of being a resident in Castle Point and fighting to represent my fellow residents for sixteen years, I can say with absolute certainty, **they absolutely do.**

The Council reaches the same broad conclusion and they should be congratulated for their evidence. My challenge is whether it followed its own evidence far enough in choosing 6,196 as the minimum requirement.

The Council's own Regulation 19 Plan describes **5,950 homes, 350 a year**, as the **"total constrained housing requirement"**.³

The underlying Local Housing Needs Assessment says 350 homes a year would still accommodate all trend migration and household formation, although not every potential single-person household would form. That consequence must be weighed honestly.⁴

But the latest July 2026 housing update now identifies total housing supply of **6,312 homes**.⁵

So the question is simple.

If the Council calls 5,950 the total constrained housing requirement, and now identifies supply of 6,312, what is the planning justification for making 6,196 the minimum?

Why convert almost all of that additional supply into a minimum obligation rather than retain some flexibility?

In Castle Point, a coastal community entirely dependent on three 'principal strategic highway routes out', and where a third of the habitable land is below sea level and only kept by a complex interweaving drainage network, the physical constraints matter enormously.

Transport is perhaps the clearest example.

At the examination for the 2019 Draft Local Plan I described Castle Point as entirely dependent on three principal road routes in and out:

- east on the A13 towards Southend,
- west through Sadlers Farm,
- and north through Rayleigh Weir.

I wish the evidence before this examination showed that those problems had been solved. Instead it shows clearly the problems have got far worse.

Sir, Madam, if this examination was held just five weeks earlier, you would not be sitting here.... I would not be sitting here...., and those who have travelled here from outside the Borough to argue for a greater housing number certainly would not be sitting here.....We would all have been sitting in a line of cars in delays of up to 90 minutes when planned gas works closed Tarpots by Sadlers Farm. That was a perfect demonstration of the transport problems our Borough and Bowers Gifford already face, and why Castle Point cannot take 11,662 new houses and flats with **around 14,000 additional household cars associated with them.**

What happened at Tarpots is not simply an anecdote. Essex County Council's Chief Executive, Nicole Wood, has written to me detailing "the fragility of the road network when events or incidents occur". That is exactly what residents saw.²⁶

The Council's own Matter 1 evidence says that **even at 6,196 homes, and even with mitigation**, traffic conditions worsen. It expects capacity to be exceeded on Canvey Way, the A13, the A129 Rayleigh Road and at Canvey Road/Long Road, and says there are no funded proposals capable of providing the highway capacity needed for materially higher growth.⁷

Sir, Madam, there is a vital piece missing from the case that Castle Point can sustainably accommodate 6,196 new homes: a revised Transport Assessment which satisfies Essex County Council, our statutory Highway Authority.

The Chief Executive of Essex County Council has confirmed to me in writing that as of two weeks ago a revised Transport Assessment has still not been provided to the County Council as the highway authority for review, and I am quoting directly from her here "in order that we can be satisfied that the proposed level of growth, namely 6,196 homes can be satisfactorily accommodated on the highway network in terms of capacity and safety". She adds that "it remains unclear how many of the key issues identified in the Jacobs Review have been completed to the satisfaction of ECC".²⁶

The Borough Council has known since at least 2 February that the Transport Assessment remained an area of disagreement with Essex County Council and that important work was still outstanding. Seven months later, the Highway Authority still tells me that it has not received the revised Transport Assessment it needs in order to satisfy itself that 6,196 homes can be accommodated in terms of capacity and safety.

That is truly extraordinary position to be in at the examination of a Local Plan.

So I ask a very simple question. Is that good planning? Is it sustainable planning? And, more fundamentally, is it right?

Can a Plan for 6,196 new homes, let alone the Government's 11,662 new homes figure, properly be allowed to proceed when the statutory Highway Authority has not yet been able to say that even the lower figure can be satisfactorily

accommodated in terms of capacity and safety on our local and strategic road network?

Sir, Madam I do not believe it can.

Before you decide how many more homes Castle Point can take, surely you first have to know whether the roads can safely take the traffic. At present, the Highway Authority cannot give you that assurance.

As planners, you would not approve the plans for a bridge before knowing whether it could carry the weight it needs to. Sir/Madam I do not see you can approve a housing strategy before knowing whether the roads can actually safely carry the traffic.

The burden of proof here should not be on residents to prove that the roads cannot cope. The Plan should demonstrate that they can. At present, Essex County Council says the evidence necessary to give that assurance is still outstanding.

Those outstanding issues are not small details. ECC called for all in-scope junctions to be modelled, asked why junction modelling at **Fairglen, Sadlers Farm and Rayleigh Weir** had not been undertaken, required further assessment of cross-boundary impacts on the A13, A127 and A130, and asked for evidence showing how the proposed interventions would actually support the Plan and achieve modal shift.²⁶

That cross-boundary point matters enormously, because Castle Point is not a closed transport system. **It sits in the middle of a South Essex transport funnel.**

Basildon's emerging Local Plan is planning for 26,909 homes to 2043 and the Government have just forced them to continue with it despite the new Council administration's objection. Southend's latest draft plan says it can accommodate up to 14,700 homes, including around 4,900 in a new neighbourhood north of the city. Rochford's current draft works from 13,780 homes before its five per cent buffer. That said, if all those plans go forward with the same amount of housing, taken

together, that is more than 55,000 homes being planned or tested in those three neighbouring authorities alone, before Castle Point adds another 6,196.²⁷

I am pleased however that both Rochford and Southend are listening to their residents and looking at their plans again.

I am not suggesting every one of those homes in our neighbouring districts sends a car through Sadlers Farm or Rayleigh Weir. Of course it does not. **But traffic does not stop at a council boundary simply because the Local Plan does.**

These are shared corridors. Southend's own evidence says its longer journeys are funnelled westwards and that the A13 and A127 already suffer high congestion, with parts of the network near or at design capacity. Rochford's Transport Assessment identifies the A127 as a key route for Rayleigh and tests the same strategic network. Basildon's growth likewise depends on the A127, A13 and the wider A130 network.²⁷

Fairglen is particularly revealing. Essex County Council says the A127/A130 interchange **"has reached its capacity"**. The funded improvement is expressly described as a **"short-term"** scheme designed to handle current and estimated future traffic only up to 2036. Yet this Plan runs to 2043 and it was announced earlier in the year that that scheme would be delayed until 2030.²⁷

If the Fairglen Interchange improvement is designed for estimated traffic only to 2036, what is the evidenced and deliverable solution for the final seven years of this Plan, while Castle Point, Basildon, Rochford and Southend are all having to produce local plans with substantial growth?

At Sadlers Farm, the same cumulative question applies. The A13/A130 interchange does not serve Castle Point alone. It receives traffic from the wider South Essex network. **A road does not cease to be affected by development because it is already full. If congestion forces traffic onto other routes, that is evidence of the constraint, not evidence that the development has no impact.**

The Council may say that its 2043 reference model already includes planned growth in neighbouring authorities. I recognise that. But Essex County Council's latest

position is that further assessment of cross-boundary impacts on the A13, A127 and A130 is still required.²⁶

National planning guidance is clear that a Local Plan transport evidence base should consider the cumulative impacts of existing and proposed development, test the capacity of transport infrastructure against forecast demand, and may need to cover an area wider than the Local Plan boundary. The National Planning Policy Framework also requires effective joint working on cross-boundary strategic matters which have been dealt with rather than deferred.²⁸

So the question is not whether neighbouring growth was mentioned somewhere in the model. The question is whether a reasonable, up-to-date cumulative future scenario has been satisfactorily tested across the shared South Essex network.

If the cumulative future traffic has not been satisfactorily tested, then neither has the sustainability of the housing number.

At Rayleigh Weir, Castle Point Borough Council un-updated Transport Assessment says the main links are approaching capacity and relatively minor increases could take them to theoretical capacity. Later, the projections show that traffic movements appear to fall because ‘congestion on feeder networks prevents as much traffic reaching the junction’.⁸

If traffic disappears from one junction because it is stuck at another, the road network has not improved. The traffic jam has just moved.

At Sadlers Farm, the final December 2025 Transport Assessment still contains paragraph 10.3.8, immediately after the relevant flow figures, marked simply “TBC”.⁹

The Transport Assessment contains traffic forecasts and analysis for these strategic junctions. But ECC’s latest position is clear that the **junction modelling it required was not completed in the submitted evidence**. Flow figures are not the same thing

as demonstrating that a junction can safely accommodate the growth and identifying the mitigation required.²⁶

Sir/Madam, I put it to you that an argument justifying thousands more homes is not an argument at all if its based on evidence **“to be confirmed”**.

National policy asks practical questions: can significant capacity and congestion impacts be cost-effectively mitigated to an acceptable degree, and what severe residual cumulative impacts remain after mitigation?¹⁰

I understand that major transport funding is often linked to housing and employment growth. But that does not remove the need for the Plan to demonstrate that the growth it proposes can actually be accommodated safely, and that the mitigation it relies on is realistic, funded or fundable, and deliverable.

Otherwise we risk going round in circles: saying we need the houses to unlock the funding for the road improvements, and then relying on those hoped-for road improvements to justify the houses.

Until those questions are answered, the answer surely cannot be to increase the housing requirement. If anything, this strengthens my case that the minimum should be lower. Materially higher growth could only even be contemplated with transformational infrastructure: a credible third-access solution for Canvey and, for any future North West Thundersley option, a genuinely new strategic access solution acceptable to the highway authorities. Neither exists today.²⁶

Sir, Madam, Flood risk provides another example of why Castle Point cannot sensibly be treated as a blank area on a housing spreadsheet.

I want to be precise about this. I am not suggesting that new housing automatically increases flooding. New development is expected to use sustainable drainage and must not increase flood risk elsewhere.

But that is not the end of the Matter 1 question. The issue here is cumulative resilience.

Canvey Island is very low lying. Its surface-water system depends upon an interconnected network of drains, dykes, culverts, storage areas, tidal outfalls and pumps. The submitted Plan itself acknowledges the finite capacity of culverted parts of the drainage infrastructure, and that some flapped outfalls only operate at all at low tide.¹¹

The Council's Matter 1 evidence goes further. It says extensive surface water accumulates across open land on Canvey. It identifies a significant concern that developing open land to the west of Canvey could alter the topography and drainage network and affect flooding within the existing urban area. It also points back to the Canvey Six Point Plan following the severe floods in 2014 and says the Island needs additional green storage space for surface water, not less.¹²

On Canvey, surface water flood storage is not spare land. It is part of the infrastructure that keeps homes dry.

The Canvey Green Belt Campaign has persistently made that point through successive Local Plans. Its submissions have rightly asked decision-makers to look beyond the simple Green Belt label and understand the practical function that open land performs on a low-lying island, alongside the very real constraints of flood risk, drainage and access.

Up to 1,000 properties were affected in the floods on Canvey in 2014. The Government Office for Science peer review of the Section 19 flood investigation. A review that I myself secured from the Government, described an extremely complex drainage system, identified problems involving water reaching the pumps, power and pump resilience, and recommended integrated modelling and further infrastructure review.¹³

Much work has been done since, including an integrated drainage model. But the 2022 Section 19 investigation into the flooding event of 20 October 2021, when

around 60 homes and indeed this very building were flooded, still recommended updated modelling, flood-alleviation measures and review of whether further drainage improvements or storage were required.¹⁴

Anglian Water does not say development is impossible. But nor does its evidence support an assumption of unlimited spare capacity. For proposed connections to existing public surface-water sewers, capacity must be demonstrated and reinforcement may be required.¹⁵

So I would ask those seeking materially higher growth: where is the cumulative evidence demonstrating that the additional development can be accommodated without increasing flood risk to the people who already live there?

Showing that an individual development can contain its own runoff is not quite answering the same question.

The Council itself concludes that increasing development above the Plan numbers would put additional pressure on the Borough's flood-management systems and reduce opportunities to improve resilience to severe weather and climate change.¹²

The same applies to infrastructure more generally.

The Council's Matter 1 statement reports infrastructure costs rising from about £64.1 million for the Plan strategy to about £120.6 million and £151.3 million in the higher-growth scenarios, with increasing delivery challenges.¹⁶

So higher growth is not simply more houses. It carries disproportionately greater infrastructure requirements in a Borough where delivery is already extremely difficult.

That brings me to the Green Belt examples on your agenda. I am not asking you to determine any of them today. But if they are being used to test whether the Council's approach is robust, then the Council's own evidence about them matters and as I won't be here to speak on them as they come up throughout the rest of the proceedings I hope you understand why I wish to make a few brief comments on them now.

Grey Belt is not a planning permission; the problem is it often leads to it in council chambers or at appeal. A lower Green Belt score according to the Government's definition does not delete the transport constraints, delete the drainage constraints or magically remove the wildlife and rare habitats that mean the site should be preserved.²²

GB4 – Land off Glebelands, GB5 – Jotmans Farm, GB6 – land between Felstead Road and Catherine Road and the Green Belt sites listed on Canvey that can be used as examples today are all entirely or partially in the Grey Belt. Sir/Madam, I will not be going through every one of those sites today, but I do hope you will allow me to submit to you in written form the arguments I have myself submitted to the Council as to why they should have their potential Grey Belt designation in the plan reconsidered and removed.

There is also an important point about appeal permissions. It is proper to count deliverable permissions in the housing supply. But that is an accounting exercise; it does not make the surrounding Green Belt suitable for more development. **GB10 and GB12 show exactly why.²²**

GB12 – The Chase. Parts already have planning permission or have been built, but the Council says the remainder still has serious biodiversity, landscape and delivery constraints, including The Chase Paddocks Local Wildlife Site and 18 separate landowners. The Council itself says those permissions do not justify allocating the rest. **The loss of one piece of Green Belt must not make the next one easier to lose.²²**

GB10 – South-East of Daws Heath. Brook Farm's 173-home appeal permission sits within the wider area and is counted in supply. Yet DAC still assessed the wider sub-area as strong Green Belt and did not recommend it for further consideration. It also

adjoins Dodds Grove SSSI, ancient woodland and Local Wildlife Sites and lies largely in a Critical Drainage Area.²²²³

GB11 – South-West of Daws Heath. This is also assessed as strong Green Belt within the Daws Heath Ring, with ancient woodland and Local Wildlife Sites at or beside it, and much of it in a Critical Drainage Area. It is also poorly located for schools and basic health services.²³

GB14 – land south of Daws Heath Road. This was not recommended by DAC report. It has priority woodland, significant ancient woodland along its southern edge, heritage constraints and a Critical Drainage Area, and forms part of the strategically important Daws Heath Ring.²³

GB8 – South of Hadleigh. The Council's July Sustainability Appraisal records it as strong Green Belt, not Grey Belt, with a Scheduled Monument on the site, heritage and archaeological constraints, adjacent Local Wildlife Sites and high landscape sensitivity on part of the land. Save Hadleigh Farm has also raised detailed concerns about the consistency of the assessments. Whatever view is eventually taken of those detailed arguments, this is not evidence of easy sustainable capacity.²¹²³

Land east of Kings Park Village on Canvey. It remains Green Belt beside internationally protected marshes and the sea defences, is in Flood Zone 3 and has historic landfill considerations. The Council says it was not promoted for inclusion during preparation of this Plan and is not available for development, and has instead identified it as a potential Biodiversity Net Gain location.²⁴

If these examples prove anything, it is that identifying land on a map is not the same as identifying sustainable housing capacity.

North West Thundersley is different, and I want to be candid about the evidence. I am not asking you to allocate it today. The Council say it is not currently deliverable in this Plan period and that direct access to the A127 or A130 is not currently feasible. I do not ignore that.²⁵

But the same evidence treats it as a broad strategic location of about 187 hectares and says any future development would have to be comprehensively masterplanned

across council boundaries. If, despite all the evidence, substantially more development is ever forced on Castle Point, my clear preference is that it should be planned as one comprehensively masterplanned community at North West Thundersley, but only if a genuinely new strategic access solution and the necessary infrastructure can be agreed first. I would rather see that than thousands more homes piled onto already over-dense Canvey or a patchwork of smaller Green Belt releases across the Borough.²⁵

Sir / Madam, I submit that better distribution is not the same thing as more development. Theoretical land capacity is not the same thing as sustainable housing capacity.

I also want to address briefly some of the arguments made for increasing the figure.

Persimmon refers to historic under-delivery and backlog. But Government guidance says the affordability adjustment in the Standard Method already factors in past under-delivery and that there is no requirement to add it again separately when establishing the minimum annual local housing need figure.¹⁷

Sir, Madam, Persimmon are urging you to count the same problem twice, please do not.

Others point to more Green Belt release. But the examples on your own agenda show why hectares on a map are not housing capacity. National policy requires consideration of the remaining Green Belt, reasonable alternatives and the sequence for land release.¹⁸

The test is not simply whether land exists. It is whether development can be accommodated consistently with Green Belt policy, flood risk, ecology, infrastructure and sustainable transport.

Nor do I rely on historic delivery alone. Rainier fairly says the past cannot determine what a new Plan can deliver. My case rests on the forward-looking transport, flood, infrastructure and housing evidence before this examination.¹⁹

I also want to acknowledge Councillor Alan Tibbit's detailed submission. I do not need to ask you to determine every proposition he advances to recognise the importance of the central questions he raises about highways, infrastructure, soundness and whether reasonable alternatives have genuinely been tested. Those are proper planning questions and they deserve proper answers.

My first request is therefore that you do not increase the housing requirement above 6,196.

The Council's own evidence shows why materially higher growth would have serious cumulative consequences for transport, flooding, infrastructure and the environment.

But I would ask you to go one step further.

Please test why 5,950, which the Council's own Plan calls its total constrained housing requirement, has not been used as the minimum requirement in SP3, particularly now that the Council identifies an overall supply of 6,312 homes.

One thing that has struck me throughout this process is the quality of the work residents themselves have undertaken. Councillor Tibbit, the Canvey Green Belt Campaign, Save Jotmans Farm, the Save Hadleigh Farmland Group and many others have read technical documents, challenged assumptions and brought decades of local knowledge to this process. Local knowledge is not a substitute for technical evidence, but neither should technical evidence be considered in a vacuum from the place it is supposed to describe.

Castle Point needs new homes, but Castle Point is not a blank sheet of graph paper. It is a small coastal Borough, constrained by water, Green Belt and strategic roads already under enormous pressure.

Sir/Madam, I want to finish by asking you to stand back from the individual sites, the individual junctions and the individual technical assessments for a moment, and look at Castle Point as one place and one interconnected system.

That is important because the effects of development do not stop at the red line around a housing site.

A car leaving a development in Canvey may end up at Tarpots, Sadlers Farm or Rayleigh Weir. Water displaced in one part of a catchment has to go somewhere else. Development on one piece of open land can affect the function of the Green Belt around another. Pressure on schools, doctors, roads, drainage and other infrastructure is cumulative.

And the scale of what we are talking about should not be lost in all these technical documents.

Castle Point has a population of around 90,000 today.

But the demographic modelling for 11,662 homes projects an increase of **15,405 residents** between 2026 and 2043.¹

That is an increase equivalent to just under 20% of the population we have today, in just seventeen years.

So I would ask you to consider the Government figure in those terms, and with that in mind I would ask you Sir and Madam, to consider a set of questions similar to the ones I posed at the hearing for the 2019 draft plan for Castle Point:

If you were designing a town of more than 100,000 people today, would you design it fully relying on three strategic routes in and out, two of which are approaching or exceeding capacity?

I do not believe you would.

Would you design part of that town as an island of around 40,000 people, dependent upon two roads which converge into the same roundabouts towards the mainland?

I do not believe you would.

Would you put two COMAH major-hazard installations alongside that substantial existing residential population and then assume that considerably more development around that island should simply follow because a national housing formula produces a number?

I do not believe we would.

Would you choose to place thousands more homes on a low-lying island with a drainage system dependent upon drains, dykes, culverts, storage areas, pumps and tidal outfalls, when the evidence tells us that parts of that system have finite capacity and that Canvey needs more surface-water storage, not less?

I do not believe you would.

Would you knowingly add thousands more homes to a Borough when the statutory highway authority says it has not yet been able to satisfy itself that they can be safely accommodated on the highway network there and where the Council's own evidence says that figure worsens congestion and pushes key routes and junctions beyond capacity; and where there is no funded scheme capable of providing the additional highway capacity required for materially higher growth?²⁶

Again, I do not believe you would.

None of those constraints exists in isolation. That is precisely the point.

If Castle Point consisted only of a housing spreadsheet, 6,312 new houses, or even 11,662 houses, might look achievable.

But Castle Point is not a spreadsheet. It is Canvey Island, Benfleet, Hadleigh, Thundersley and Daws Heath. It is the A13, Canvey Way, Sadlers Farm and Rayleigh Weir. It is flood storage, pumping stations and tidal outfalls. It is nationally and internationally important habitats, strongly performing Green Belt, schools, surgeries and communities that already depend upon the same finite infrastructure.

You cannot judge whether Castle Point can accommodate around 20% more people by looking at each constraint one at a time. You have to look at what happens when you put them all together.

And when you do that, I believe the answer becomes clear.

I support the Council in saying that 11,662 homes cannot be sustainably accommodated in Castle Point.

But I ask you to go further than the Council has.

Its own evidence describes 5,950 homes as the total constrained housing requirement. Its latest evidence identifies more housing supply than that.

So my request is simple.

Do not ask Castle Point to accommodate a theoretical number which its roads, drainage, environment and infrastructure cannot sustainably support.

Good planning should fit the number to the place, not force the place to fit the number.

Thank you.

All references are consolidated here so the oral script remains uncluttered. Document numbers refer to the Castle Point Plan Examination Library where available.

1. Castle Point Local Housing Needs Assessment Update 2025, Opinion Research Services, June 2025, para 1.6 and paras 2.3-2.5: 11,662 dwellings for 2026-2043 under the December 2024 Standard Method; the associated demographic modelling projects an increase of 15,405 residents over the period. ONS Census 2021 records Castle Point's population at about 89,600, rounded in the oral submission to around 90,000. URLs:
<https://www.castlepoint.gov.uk/documents/d/guest/local-housing-needs-assessment-update-june-2025-pdf> and
<https://www.ons.gov.uk/visualisations/censuspopulationchange/E07000069/>
2. Planning Practice Guidance, Housing and economic needs assessment, paras 001-002 (December 2024 revision): housing need is an unconstrained assessment and the Standard Method does not itself produce a housing requirement figure. URL: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>
3. Castle Point Plan Regulation 19 Draft, July 2025, para 13.9: the 2025 Local Housing Needs Assessment is described as identifying a "total constrained housing requirement" of 5,950 dwellings, 350 per annum. See also Housing Capacity Topic Paper, August 2025, para 3.8. URL: <https://www.castlepoint.gov.uk/documents/d/guest/castle-point-plan-regulation-19-draft-july-2025-pdf>
4. Opinion Research Services, Castle Point Local Housing Needs Assessment Update 2025, June 2025, Sensitivity Testing paras 16-17 and Figure 5: 350 dwellings per annum, 5,950 over 2026-2043, would accommodate trend migration and household formation but not all potential single-person household formation.
5. Castle Point Plan Housing Position Update Note, July 2026, Table 7: total housing supply at 1 April 2026 is 6,312 homes. The same note's trajectory table uses a 6,194 cumulative target, a two-home discrepancy from the submitted SP3 figure of 6,196; that minor arithmetic point is not relied upon in the oral case.
6. Castle Point Plan Housing Topic Paper, July 2025, paras 7.1-7.2 and Table 1: 990 net additional dwellings were delivered from 2015/16 to 2024/25, an average of 99 per annum. URL:
<https://www.castlepoint.gov.uk/documents/d/guest/housing-topic-paper-july-2025-pdf>
7. Castle Point Borough Council Matter 1 Hearing Statement, July 2026, paras 1.90-1.99: at 6,196 homes with mitigation, traffic conditions worsen; capacity is expected to be exceeded on the A130 Canvey Way, A13 Sadlers Farm to Kents Hill Road, A129 Woodmans Arms to Rayleigh Weir and Canvey Road/Long Road; there are no funded proposals capable of providing the extra highway capacity required for materially higher growth. URL:
<https://www.castlepoint.gov.uk/documents/d/guest/16-01-castle-point-housing-requirement-and-provision-matter-1>
8. Castle Point Transport Assessment Update, Final Report, 5 December 2025, para 9.2.14 and paras 10.3.11-10.3.13: links at Rayleigh Weir approach capacity; relatively minor increases could reach theoretical capacity; reductions in some movements arise because congestion on feeder networks reduces traffic reaching the junction. URL:
<https://www.castlepoint.gov.uk/documents/d/guest/transport-assessment-update-december-2025>
9. Castle Point Transport Assessment Update, Final Report, 5 December 2025, Sadlers Farm section: para 10.3.8, immediately after Figure 86 and before the Rayleigh Weir section, is marked "TBC". The report contains traffic-flow forecasts and other analysis, but ECC's later correspondence (see note 26) records that its technical review required justification for why junction modelling of Fairglen Interchange, Sadlers Farm and Rayleigh Weir had not been undertaken, and states that the submitted Transport Assessment did not address those key issues.

10. National Planning Policy Framework, December 2024, paras 115(d) and 116: significant transport impacts should be capable of cost-effective mitigation to an acceptable degree; decisions on highways grounds turn on unacceptable safety impacts or severe residual cumulative network impacts after mitigation, taking account of reasonable future scenarios. Archived PDF: https://assets.publishing.service.gov.uk/media/67a610df6006e4154dc498a0/NPPF_December_2024.pdf
11. Castle Point Plan Regulation 19 Draft, July 2025, paras 21.28-21.29: Canvey's flat, low-lying topography and the finite capacity of culverted drainage infrastructure are identified; some flapped outfalls drain only at low tide; the Integrated Urban Drainage model provides a detailed representation of the Island's drainage network.
12. Castle Point Borough Council Matter 1 Hearing Statement, July 2026, paras 1.84-1.89: extensive surface water accumulates across open land on Canvey; there is a significant concern that development on open land to the west could alter the topography and drainage network and affect flooding in the existing urban area; the Canvey Six Point Plan identifies the need for additional green surface-water storage; higher growth would place additional pressure on flood-management systems.
13. Government Office for Science, Peer Review of the July 2014 Canvey Island Flooding Section 19 Investigation, pp.2-4: Canvey's drainage system is described as extremely complex and fragmented; problems included water not reaching pumps sufficiently quickly, power and pump resilience; recommendations included an integrated drainage study and peer review of drainage and pumping infrastructure.
14. BMT, Section 19 Flood Investigation Report for Castle Point, 11 August 2022, pp.24-28: the October 2021 event overwhelmed drainage in places; the report records possible tide-locking and recommends updated hydraulic modelling, flood-alleviation measures, and Anglian Water review of the need for further drainage-network upgrades or additional storage for tide-lock scenarios.
15. Statement of Common Ground between Castle Point Borough Council and Anglian Water, November/December 2025, pp.10-13: for proposed surface-water sewer connections, capacity must be demonstrated; Anglian Water notes an assumption of minimal residual capacity in an existing catchment when considering a new connection and says reinforcement or other works may be required where sufficient capacity is unavailable. The SoCG records no areas of disagreement between Anglian Water and the Council.
16. Castle Point Borough Council Matter 1 Hearing Statement, July 2026, paras 1.101-1.108: Infrastructure Delivery Plan Scenario 1 approximately £64.122m (£11,958 per home); Scenario 2 approximately £120.582m (£16,036 per home); Scenario 3 approximately £151.307m (£17,106 per home). The Council says higher growth increases infrastructure demands, costs and delivery challenges.
17. Planning Practice Guidance, Housing supply and delivery, para 001 (December 2024 revision): where the Standard Method is the starting point, the affordability adjustment factors in past under-delivery, so there is no requirement to address under-delivery separately when establishing the minimum annual local housing need figure. Persimmon/Pegasus Matter 1 Hearing Statement, July 2026, para 2.1, raises historic under-delivery and backlog. URL: <https://www.gov.uk/guidance/housing-supply-and-delivery>
18. National Planning Policy Framework, December 2024, paras 146-148: Green Belt review/release must consider the purposes of the remaining Green Belt across the plan area, reasonable alternatives and the priority sequence for release. Archived PDF: https://assets.publishing.service.gov.uk/media/67a610df6006e4154dc498a0/NPPF_December_2024.pdf
19. Rainier Developments & Strategic Land Matter 1 Hearing Statement, July 2026, including paras 2.29-2.34 in the version relied upon in the earlier hearing draft: historic delivery conditions are not, by themselves, determinative of what a new Plan can deliver. The oral case therefore relies principally on Plan-specific forward-looking evidence.
20. Inspectors' Initial Examination Guidance Note, 17 June 2026, paras 15-17; Final Matter 1 Agenda for hearings beginning 8 September 2026, items 4-9; and Inspectors' written clarification conveyed by Programme Officer Annette Feeney on 6 September 2026. The Inspectors clarified that the named Green Belt sites are being raised as examples only to test the Council's approach to preparing the Plan, that omission sites are not before them, and that they are not examining the soundness of any individual site at this stage.
21. Save Hadleigh Farmland Group, Matter 1 Hearing Statement, July 2026, paras 21-23: challenges the consistency of the landscape and SLAA assessments for Hadleigh Farm/GB8.
22. Castle Point Borough Council, Matter 1 Hearing Statement – Housing Requirement and Provision, July 2026, paras 2.2-2.10 and Table 5 (site-specific reasons for non-allocation of GB4, GB5, GB6 and GB12); paras 2.23-2.31 and Table 6 (Green Belt permissions within GB10 and GB12); and paras 3.21-3.28 (strategic Green Belt role of the Central Corridor and Daws Heath Ring). URL: <https://www.castlepoint.gov.uk/documents/d/guest/16-01-castle-point-housing-requirement-and-provision-matter-1>

- 23.** Castle Point Sustainability Appraisal – Detailed Assessment of Green Belt Development Options Sites, July 2026: site assessments for GB4 (Land off Glebelands), GB5 (Jotmans), GB6 (Felstead Road/Catherine Road), GB8a/GB8b (South of Hadleigh), GB10 and GB11 (Daws Heath), GB12 (The Chase), GB14 (Land South of Daws Heath Road) and GB16 (North West Thundersley).
- 24.** Castle Point Regulation 19 consultation officer response to Cove UK representation 1097-0001 on land east of Kings Park Village: the site remains Green Belt, was not promoted for inclusion during plan preparation and is not available for development; it is identified as a potential Biodiversity Net Gain location. The withdrawn 2019 Local Plan, paras 10.112-10.113 / Policy HO31, records the site's proximity to the Benfleet and Southend Marshes Ramsar/SPA and Hadleigh Marshes SSSI, Flood Zone 3 and sea-defence requirements, and historic landfill considerations. URLs: <https://www.castlepoint.gov.uk/documents/d/guest/regulation-19-consultation-spreadsheet-cpp-surname-a-d> and <https://www.castlepoint.gov.uk/documents/d/guest/6-6-pre-submission-local-plan-2019-pdf>
- 25.** Statement of Common Ground between Castle Point Borough Council and Essex County Council – North West Thundersley Development Option, August 2025, paras 4.3-6.10: approximately 187 hectares; theoretical SLAA capacity of 5,624-9,373 dwellings; significant access and infrastructure constraints; not deliverable within the current Plan period; direct access to the A127/A130 not considered feasible under current advice; any future growth would require comprehensive cross-boundary masterplanning and strategic infrastructure work.
- 26.** Email from Nicole Wood, Chief Executive of Essex County Council, to Dame Rebecca Harris MP, responding to Rebecca's emails of 28 and 31 July 2026 and received ahead of the September 2026 examination. The email states that ECC already has information about existing traffic conditions and "the fragility of the road network when events or incidents occur". It records that ECC's review of the Regulation 19 transport evidence identified significant outstanding issues, including modelling of all in-scope junctions; justification for the absence of junction modelling at Fairglen Interchange, Sadlers Farm and Rayleigh Weir; further assessment of cross-boundary impacts on the A13, A127 and A130; and further evidence for the Schedule of Interventions. It says the Plan was submitted on 31 January 2026 with a Transport Assessment which did not address those issues. It further records that ECC signed a Statement of Common Ground on 2 February 2026 setting out Areas of Disagreement, with the Transport Assessment a key piece of evidence, and that the SoCG stated there was ongoing work between CPBC and ECC on the Transport Assessment and other outstanding matters. The email says that, despite subsequent work by SYSTRA, a revised Transport Assessment had still not been provided to ECC for review "in order that we can be satisfied that the proposed level of growth, namely 6,196 homes can be satisfactorily accommodated on the highway network in terms of capacity and safety". It further states that "it remains unclear how many of the key issues identified in the Jacobs Review have been completed to the satisfaction of ECC". Private correspondence held by Dame Rebecca Harris MP's office.
- 27.** South Essex cumulative growth and transport context: Basildon Borough Local Plan 2023-2043, Regulation 19, Policy SG1, provides for a minimum of 26,909 dwellings; Southend-on-Sea City Council's draft Local Plan position published 27 July 2026 states that its evidence demonstrates capacity for up to 14,700 homes, including around 4,900 homes in a proposed infrastructure-led neighbourhood north of Southend; Rochford District Council Draft Local Plan, February 2026, Table 2, identifies 13,780 dwellings at 689 per annum, rising to 14,469 with a five per cent buffer. Southend's Infrastructure Delivery Plan states that the A13 and A127 experience high congestion, with parts of the network near or at design capacity, and that significant growth across South Essex will require additional strategic transport interventions. Rochford's Regulation 18 Transport Assessment identifies the A127 as a key route for Rayleigh and assesses the wider network including Rayleigh Weir and Fairglen. Essex County Council describes the A127/A130 Fairglen Interchange as having reached capacity and its funded improvement as a short-term scheme intended to handle current and estimated future traffic levels up to 2036. Web addresses: <https://www.southend.gov.uk/news/article/3567/southend-draft-local-plan-proposes-lower-housing-target-and-greater-local-control-over-development> ; <https://www.rochford.gov.uk/media/3800> ; <https://www.rochford.gov.uk/media/3775> ; <https://www.essexhighways.org/highway-schemes-and-developments/major-schemes/a127-a130-fairglen-interchange>

28. Planning Practice Guidance, Transport evidence bases in plan making and decision taking, paragraphs 003, 005 and 011: the transport evidence base should consider the cumulative impacts of existing and proposed development, assess transport infrastructure capacity against forecast demand, identify short-, medium- and long-term transport proposals, may appropriately cover an area wider than the Local Plan boundary, and should ideally cover the Plan period. National Planning Policy Framework, December 2024, paragraphs 24-28 and 36: effective strategic planning across local authority boundaries is important to sustainable growth and strategic infrastructure; cross-boundary matters should be addressed through joint working; and a sound Plan should be deliverable over the Plan period with cross-boundary strategic matters dealt with rather than deferred. Web addresses: <https://www.gov.uk/guidance/transport-evidence-bases-in-plan-making-and-decision-taking> and https://assets.publishing.service.gov.uk/media/67a610df6006e4154dc498a0/NPPF_December_2024.pdf