AGENDA ITEM NO.11

ORDINARY COUNCIL

23rd MARCH 2022

Subject: **Adoption of the Castle Point Local Plan**

Report of: **Interim Chief Executive – Andrew Grant**

---

1. Purpose of Report

The purpose of this report is to recommend that Members agree the adoption of the New Castle Point Local Plan 2018-2033 (hereafter referred to as the "Local Plan"). It also seeks approval to publish a Policies Map. The recommendation also seeks to revoke the existing Adopted Local Plan (1998, saved policies 2007). The report follows the examination of the Local Plan and the receipt and publication on 3rd March 2022 of the Inspector's report.

2. Links to Council's Priorities and Objectives

The local plan seeks to achieve elements within each of the new Corporate Plan objectives - Economy and Growth, People, Place and Environment

3. Recommendations

1. **To consider the content of the Inspector's Final Report into the Examination of new Castle Point Local Plan, as set out in Appendix 1.**

2. **To adopt the New Castle Point Local Plan 2018-2033 (as set out in Appendix 3), incorporating the Main Modifications as set out in the Inspector's Final Report, and other Additional Modifications (as set out in Appendix 2), and that the New Castle Point Local Plan replaces the Castle Point Local Plan 1998**

3. **Subject to recommendation 2, that the Council approves Policies Map (see Appendix 4) that it be published alongside the New Castle Point Local Plan 2018-2033.**

4. **Subject to recommendation 2, to note the content of the Sustainability Appraisal, and Habitats Regulations Assessment (HRA), and that they be published in accordance with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004.**

5. **Subject to Recommendation 2, that the Equalities Impact Assessment is approved.**

6. **Subject to recommendation 2 to give delegated authority to the Head of Place and Policy, in consultation with the Leader of the Council, to**

make any necessary minor textual, presentational or layout amendments to the new Castle Point Local Plan 2018-2033 (Appendix 3), and the Adoption Statement (Appendix 7), before publication, and to undertake all the necessary legal and procedural adoption processes.

7. **Subject to recommendation 3 to give delegated authority to the Head of Place and Policy, in consultation with the Leader of the Council, to make any necessary presentational changes to the Policies Map, including the creation of a web-based version.**

8. **In the event that recommendation 2 is not agreed, that a report be made to a future meeting of the Council.**

---

4. Background

The New Castle Point Local Plan

4.1 On the 3rd March 2022 the Council received and published the Inspector's Final Report on the Examination of the New Castle Point Local Plan. In his report, the Inspector, Mr Philip Lewis BA (hons) MA MRTPI, concluded that with modifications the new Castle Point Local Plan is **legally compliant and sound, and capable of adoption**. Receipt of the Inspector's Report concludes the examination of the New Local Plan.

4.2 On the 22nd October 2019 the Council agreed to proceed with the publication of the Pre-Submission Local Plan and submit the Plan for examination, following a period of public consultation. The Local Plan was submitted for Examination on 2 October 2020.

4.3 The Council has a statutory responsibility to prepare development plan documents for the Borough in accordance with its Local Development Scheme, as set out in the Planning and Compulsory Purchase Act 2004 (the "2004 Act"). It also has a responsibility to ensure that development plans are kept up to date, and since January 2018, that any local plans are reviewed within 5 years of their adoption.

4.4 Local Plans should be prepared in consultation and engagement with the local communities and key stakeholders and in accordance with the Planning Acts and local plan regulations. The Town and Country Planning (Local Plans) Regulations 2012 (as amended) sets out the procedures to be followed.

4.5 The current development plan for Castle Point is the Castle Point Local Plan which was adopted in 1998. That plan ran to 2001 and was prepared prior to the 2004 Act, which established the 'new style' local plan based on a local development framework.

4.6 The 2004 Act did allow for local planning authorities with recently adopted 'old-style' local plans to save policies, which met the objectives of national policy at that time. In 2007 the Council saved some of the Policies in the 1998 Local

Plan. In many respects that local plan is now out of date, and the Council does not have an up-to-date local plan in place that sets out how the development needs of the borough will be met, or up to date policies that control development. Since the old Local Plan policies were saved in 2007, there have been significant changes to national planning policy and guidance, which that plan does not address.

4.7 National policy changed in 2012 with the National Planning Policy Framework (NPPF), and an out-of-date Local Plan puts the Council at risk of not be able to defend against inappropriate development, including on appeal.

4.8 On adoption of the new Local Plan it will replace with immediate effect the existing Local Plan (1998 – saved 2007). It will, with the Essex and Southend Waste Local Plan and the Essex Minerals Plan, be the development plan for the Borough.

4.9 Planning law (and set out in paragraph 2 of the NPPF) requires that planning applications must be determined in accordance with the development plan unless there are material considerations that justify otherwise. The material considerations must be justifiable in planning terms. With a new local plan in place, maximum weight is available for the Council to defend against inappropriate development.

The Inspector's Report

4.10 The Inspector issued his report on the 3rd March 2022. In paragraph 220 of his Report, the Inspector, Mr Philip Lewis, concluded that:

'The Council has requested that I recommend MMs [Main Modifications] to make the Plan sound and/or legally compliant and capable of adoption. I conclude that the duty to cooperate has been met and that with the recommended main modifications set out in the Appendix the New Castle Point Local Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.'

4.11 The examination has now been concluded and there is no further work required in that regard. Conclusion of the examination also means that other than minor changes which when taken together do not materially affect policies set out in the document, the Council cannot change the plan.

The Examination

4.12 The draft Local Plan, together with a comprehensive set of supporting documents, was submitted to the Secretary of State on 2nd October 2020. The examination of the Plan started with the submission and the appointment of the Inspector.

4.13 Mr Phillip Lewis was appointed as the Inspector to examine the Plan in accordance with the regulations and procedures. The Inspector is appointed by the Planning Inspectorate and is independent of the Council and the Government.

4.14 The Inspector is required to examine the Plan as submitted: in this case, the same plan approved by Council in October 2019. He is required to consider whether the submitted plan is sound, and if necessary, make modifications to the plan to ensure its soundness and ask the Council to consult on those modifications. In his examination, the Inspector considered all the evidence submitted with the plan, and any additional evidence he requested, plus all the representations made at the Regulation 19 stage.

4.15 The examination of plans is designed to test their soundness and ensure legal compliance. As set out in paragraph 35 of the NPPF, Plans are 'sound' if they are:

'a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.'

4.16 In the examination, the Inspector is guided by all the material submitted and national policy that is relevant and extant at the time of the examination.

4.17 As part of his examination of the Plan, the Inspector held hearings between 11th May 2021 and 29th June 2021.

4.18 The Inspector's Post Hearing letter was received on 29th September 2021. The Inspector's letter is not his final report, and the plan remained in Examination until his final report was published.

4.19 The Inspector concluded in paragraph 2 of his letter that:

'Overall, I consider that, subject to main modifications, the Plan is likely to be capable of being found legally compliant and sound.' He further stated in that paragraph that he *'will set out my reasoning for this in my final report.'*

4.20 The Inspector reserved his final decision on the legal compliance and soundness of the Plan to his final report as he wanted to consider representations made to the main modifications.

4.21 The Council noted the modifications on 24th November 2021, and consultation started on 10th December 2021 and closed on the 4th February 2022. After the end of the consultation on the main modifications and associated documents

and his consideration of representations made, the Inspector issued his final report on 3rd March 2022.

4.22 The Inspector's final report is attached in **Appendix 1**. A summary of the key points is set out below, but Members should read the Inspector's report in its entirety.

Legal Compliance (Paragraphs 10 to 35, pages 7 to 11)

4.23 The first section of the Inspector's report deals with legal compliance. This considers compliance with the Public Sector Equality Duty, the legal Duty to Cooperate, the requirements of the Planning and Compulsory Purchase Act 2004 and associated regulations, the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Habitats Regulations 2017.

4.24 The report concludes that the Plan complies with all relevant legal requirements.

4.25 Paragraph1 to 9 introduce the Inspector's Report, the main modifications, the Policies Map and context of the plan.

4.26 Following the assessment of legal compliance, the report then considers soundness, and sets out his conclusions on seven issues.

Issue One – Whether at the strategic level there are exceptional circumstances which justify altering Green Belt boundaries to meet development needs, and whether the Plan's Green Belt policies are effective? (Paragraphs 39 to 45 on pages 12 to 14)

4.27 The Inspector's report sets out the consideration of evidence in relation to this matter. He concludes at paragraph 40 that the methodology for the Green Belt Review was *clear and adequate.* Meanwhile, at paragraph 42, he sets out his conclusions in relation to the assessment of land availability in the urban area. He determines that the work undertaken in respect of the SHLAA 2018 was thorough and consistent with the approach set out in national policy. He further noted that the large site capacity assessment sought to optimise the capacity of proposed sites, including those in the urban area.

4.28 Overall, he concluded that it was not possible to rely on increasing the supply of housing within the urban area to avoid the need to alter the boundaries in the Green Belt to meet housing needs (paragraph 42). He therefore determined that '*there are strategic level exceptional circumstances to alter the Green Belt boundary to meet housing needs in the interests of the proper long-term planning of the Borough'* (paragraph 45).

4.29 The Inspector also considered the removal of school buildings and school playing fields from the Green Belt. However, he determined that the exceptional circumstances did not exist for the removal of the school playing fields at USP Canvey College Campus and the former Castle View School; Deanes School or King John School from the Green Belt and requires these to remain designated as Green Belt (paragraph 43).

4.30 He also considered the addition of 10.9ha land to the Green Belt to the west of Roscommon Way on Canvey. His report indicates that the exceptional circumstances exist for making such an addition (paragraph 44).

Issue Two – Whether the Plan makes adequate provision for new housing? (paragraphs 46 to 68 on pages 15 to 20).

4.31 The standard method set out in Planning Practice Guidance identifies the minimum local housing need for the period 2018 – 2033 for Castle Point as being 355 homes per year or 5,325 homes total, using 2021 as a basis and using the most recent workplace-based affordability ratios (the Inspector asked that 2021 be used as the starting point from which to calculate the remaining growth requirement over the remaining plan period).

4.32 As the outcomes of the standard method are a minimum requirement, the Inspector considers within his report at paragraphs 47 to 51 as to whether this need should be higher. He concludes that there is no evidence to demonstrate that actual housing need is higher than the standard method indicates, although he does note an acute need for affordable housing provision in the borough.

4.33 Paragraphs 52 to 56, meanwhile, consider whether the housing requirement in the plan should be lower as a consequence of the requirement of paragraph 11 b) of the NPPF, which states that

'strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area7; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'

4.34 Paragraph 53 sets out the Inspector's conclusion on this matter, indicating that meeting the standard method requirement for housing is appropriate in Castle Point:

'With regard to paragraph 11(b), footnote 7 of the NPPF lists the policies that protect assets or areas of particular importance. Having regard to the evidence before me, which includes the SA, the HRA, the Green Belt Review, the Strategic Flood Risk Assessments and results of the sequential and exceptions tests, and Heritage Impact Assessments and archaeological evaluation report, I conclude that the application of policies in the NPPF that protect areas or assets of particular importance do not provide a strong reason for restricting the overall scale, type or distribution of development in the Plan area as a whole'.

4.35 With regard to the supply of housing sites, meanwhile, the Inspector concludes at paragraph 67 that

'*the Plan as modified will supply specific, deliverable sites for years one to five of the plan period after adoption. I am also satisfied that it should provide sufficient developable sites for years 6-10 as per paragraph 68 of the NPPF. Furthermore, I find that at least 10% of the housing requirement will be met on sites of less than one hectare, as per paragraph 69 of the NPPF.'*

4.36 However, the Inspector recognises that housing supply will not increase suddenly due to a number of the sites currently being located in the Green Belt. He therefore sets out a stepped trajectory for the delivery of homes starting at 291 homes per annum until 2026/27, increasing to 430 homes per annum between 2027/28 and 2032/33. As a backlog has arisen since 2018, with supply averaging just 113 homes per annum, he has sought for that to be addressed via what is known as the 'Liverpool method' whereby the backlog is delivered over the remaining 11 years of the plan period (as opposed to the 'Sedgefield method' which would require the backlog to be delivered over the first five years of the plan).

Issue Three – Is the Plan positively prepared and would it be effective in addressing the likely accommodation needs of Gypsies, Travellers and Travelling Showpeople? (Paragraphs 69 to 72 on pages 20 and 21)

4.37 Consistent with the requirements of the Public Sector Equality Duty, the Inspector explored the provision being made for Gypsies, Travellers and Travelling Showpeople within the Local Plan. He used evidence set out in the *Castle Point Borough Council Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2018* in order to reach his determination.

4.38 He noted that the need for future provision in Castle Point arising from two established sites (at Janda Field and Orchard Place). He was made aware of appeal information in relation to Janda Field and was satisfied that the need arising from that site had been met through the planning application and appeal process (paragraph 70).

4.39 He was concerned, however, that any need arising from Orchard Place would be difficult to accommodate if the site remained in the Green Belt, as any application would need to demonstrate very special circumstances. This affected the effectiveness of the Local Plan in making provision for the need arising. To this end, the Inspectors report requires main modifications to policy HO7 and the policies map to inset the Orchard Place site from the Green Belt to allow for intensification of its use by Gypsies and Travellers to occur to meet any need arising.

Issue Four – Are the proposed housing allocations justified, effective and consistent with national policy? (Paragraphs 74 to 138 on pages 21 to 39)

4.40 Under this issue, the Inspector considered each of the housing allocations in turn and concluded that they were all acceptable. He did, however, require an overarching modification in relation to all allocations, and a specific modification for all allocations on Canvey Island as follows:

- Each allocation is amended to make clear that the housing figure specified is indicative and not a maximum site capacity to ensure compliance with the NPPF.
- Each allocation on Canvey Island it is made clear that self-contained residential accommodation and bedrooms at ground floor level would not be permitted.

4.41 In reviewing each allocation, the Inspector considered relevant issues that had been raised through the examination process, which varied from site to site. Where a site is also currently within the extent of the Green Belt the report also sets out a consideration of the harm to the Green Belt arising from the proposal.

4.42 Modifications were required in respect of each of the sites to address detailed policy requirements related to environmental or infrastructure requirements. These amendments strengthen the policies overall, and there are no instances where infrastructure requirements have been reduced. There are, however, a few modifications which affect the extent or capacity of a site. Key modifications in relation to the site allocations are as follows:

- **Site HO10 – Land between Felstead Road and Catherine Road, Benfleet** – The extension to the Local Wildlife Site located within this allocation was not found to be justified, and so has been redesignated as a potential Local Wildlife Site. No change has been made to the site capacity.
- **Site HO11 – Land off Glyders, Benfleet** – The site area has been reduced to create a strengthened Green Belt boundary that would serve to limit harm to the Green Belt. No change has been made to the site capacity, as the land falling within the Green Belt will be used for SUDS and landscaping.
- **Site HO20 – The Chase, Thundersley** – The site capacity has been increased from 350 homes to 430 homes, to reflect the findings of the Large Sites Capacity Assessment 2019. Recognising that the assessment undertaken in 2019 included the area of the Chase Nurseries development currently under construction the Inspector has set an indicative capacity for the rest of the site at 412 homes. The master plan requirements for this site have been retained due to its complexities.
- **Site HO23 – Land East of Canvey Road, Canvey** – The northernmost field within this allocation has been returned to the Green Belt as its allocation for development was not considered to be justified as it would give rise to unacceptable harm to the Green Belt. No change has been made to the site capacity.
- **Site HO25** – **Land at Thorney Bay, Canvey** - this policy has been substantially modified to reflect the park home provision currently being made on this site. Within policy HO25, and elsewhere in the plan as relevant the capacity of this site has been amended to 820 park homes gross, or 230 homes net of the static caravans included on the Council Tax Register in April 2018.
- **Site HO28 – Land at the Admiral Jellicoe, Canvey** – Reflecting the development management decisions that have been taken in respect of this site since October 2019, the capacity of this site is reduced from 40 homes to around 14 homes.
- **Site HO29 – Land south of Haron Close, Canvey** – Reflecting the development management decisions that have been taken in respect of this

site since October 2019, the capacity of this site is increased from 10 homes to 24 homes.

4.43 In concluding on this issue, the Inspector determines at paragraph 138 the following in relation to those sites within the current extent of the Green Belt:

Overall, therefore, for the strategic reasons set out earlier in this report and the site specific reasons referred to above, I am satisfied that there are exceptional circumstances to justify removing the following areas of land from the Green Belt to facilitate the development proposed in Policy HO1: Land west of Benfleet, Benfleet (Policy HO9), Land between Felstead Road and Catherine Road, Benfleet (Policy HO10), Land off Glyders, Benfleet (Policy HO11), Land east of Rayleigh Road, Hadleigh (Policy HO13), Land at Brook Farm, Hadleigh (Policy HO14), Land at Oak Tree Farm, Hadleigh (Policy HO16), Land north of Grasmere Road and Borrowdale Road, Thundersley (Policy HO18), Land at Glebelands, Thundersley (Policy HO19), The Chase, Thundersley (Policy HO20), Land east of Canvey Road, Canvey Island (Policy HO23) as amended, Land west of Canvey Road, Canvey Island (Policy HO24), and Land to the east of Kings Park Village, Canvey Island (Policy HO31).

Issue Five – Is the strategy and provision for employment development effective and justified? (Paragraphs 139 to 148 on pages 39 to 41)

4.44 The Local Plan made provision for 24ha of employment land against a need for around 9ha, as identified through the South Essex Economic Development Needs Assessment. This provision included the two sites on Canvey – the extension to Charfleets Industrial Estate (10.5ha) and land south of Northwick Road (9.7ha), both of which benefit from planning consent and have technical commencements. A third site of 3.7ha to the east of Manor Trading Estate made up the remainder of the provision.

4.45 In his report the Inspector concluded the following with regard to land to the east of Manor Trading Estate at paragraph 145, and as such this allocation is removed from the plan and the level of provision made within the plan for employment is reduced to around 20ha:

The level of existing commitments of employment land is such that there is no numerical or qualitative need for additional employment land provision at a strategic level for the plan period. Furthermore, whilst the planning system should actively manage patterns of growth in support of the transport objectives of the NPPF, the proposal at the Manor Trading Estate is modest in scale, and any such benefits which may arise in this regard would be limited. Consequently, I am not convinced that exceptional circumstances for the alteration of the Green Belt boundary to accommodate the extension to the Manor Trading Estate, is adequately evidenced and justified.

Issue Six – Is the Plan period of 2018 – 2033 justified? (Paragraphs 149 to 154 on pages 41 to 430

4.46 Paragraph 22 of the NPPF requires that strategic policies within a plan should look forward 15 years from the point of adoption. The Inspector's report notes

at paragraph 149 that the Plan has been prepared with a plan period of 2018 to 2033, and therefore the strategic policies would look ahead around 11 years from adoption, assuming 2022 for adoption.

4.47 He notes, however, at paragraph 150 that the employment land provision in the Plan is sufficient to extend beyond the plan period to 2036, and, in paragraph 151, he identifies that there is an adequate supply of specific, deliverable housing sites for years one to five after adoption, and specific developable sites for years 6 to 10 consistent with paragraph 68 of the NPPF. Furthermore, he notes that there is adequate provision of housing to meet the identified housing need until the end of the plan period, with a small excess providing some modest headroom.

4.48 As part of the examination process, it was suggested to the Inspector that additional sites should be identified to meet the housing need beyond 2033 to ensure 15-year supply from the point of adoption. The Inspector rejects this proposal in his report at paragraph 152, as this '*would cause significant delay to the adoption of the Plan, having a knock-on effect on the efforts of the Council to boost the supply of homes, in an area where the 2021 housing delivery test measurement was 49%'*.

4.49 It was also suggested that the Plan should be subject to a requirement for a prompt review. He again rejected this proposal in his report at paragraph 153 due to the level of housing and employment land supply being made within the plan.

4.50 Overall he concluded in relation to this matter that an otherwise sound plan, subject to the main modifications, should proceed to adoption with a plan period of 2018-2033 despite not being in line with paragraph 22. The plan period is justified.

Issue Seven – Are the development management policies clear, justified and consistent with national (paragraphs 155 to 218 on pages 43 to 58)

4.51 The development management policies in the Local Plan are numerous. The Inspector has reviewed them all and has commented on them as necessary in paragraphs 155 to 218 in his report. A significant number of the development management policies are subject to modifications, although most of these modifications are modest. Key changes are set out below:

- **Policy SD1:** The Place-making objectives initially included in policy HO1 have been brought forward to policy SD1 so they apply to all new development, rather than just housing.
- **Policy HO3:** The policy has been updated to reflect new evidence on housing mix requirements, and to ensure that the accommodation needs of older people are addressed by the plan.
- **Policy HO4:** Affordable housing requirement has been clarified as 40% for Benfleet. Retirement accommodation on Canvey has been exempt from the requirement, due to viability evidence.

- **Policies TC1, TC3, TC4 and TC5:** Health impact assessments are required for commercial proposals that involve the sale of foodstuff in order to contribute towards the creation of a healthy food environment.
- **Policy TC6:** The restriction on new takeaways near schools has been removed as it was not considered to be justified. A requirement for health impact assessment of takeaway proposals has been introduced.
- **Policies HS2 and HS3:** The requirement for an additional outdoor bowls green is removed from policy HS3 as the *Playing Pitch Assessment* does not justify it. However, policy HS2 now incorporates the provision of indoor short mat bowls provision as the *Built Facilities Assessment* justifies that addition.
- **Policy TP2:** Policy TP2 has been rewritten to only incorporate those transport schemes required to accommodate the growth arising from the plan. Aspirational schemes which address wider traffic concerns including Roscommon Way Phase 3 and a new access for Canvey Island were not found to be justified by the evidence and have been excluded from the policy. However, recognising the challenges related to access to Canvey Island, a new strategic policy concerned with achieving new and improved access to Canvey is recommended for inclusion in the plan (now **TP3**).
- **Policy GB1:** The wording of this policy is amended to remove duplication with national policy.
- **Policies, GB2, GB3, GB5, GB6 and GB8:** Replaced by a single policy (**GB2**) which removes unnecessary duplication, addresses inconsistencies with national policy and ensures it is effective in protecting the Green Belt.
- **Policy GB4:** This policy, permitting limited infilling and self-build in the Green Belt (in Great Burches, the Brambles and part of Benfleet Road), was found not to be effective and consequently it should be removed from the Plan.
- **Policy CC4:** A requirement for all new development to achieve the optional higher level of water efficiency set out in part G2 and Regulation 36(2)(b) of the Building Regulations is justified and should be included in the plan.
- **Policy NE3:** The South Canvey Green Lung is retained for its wildlife credentials. The policy has been retitled 'South Canvey Wildlife Corridor'.
- **Policy NE4 and Appendix Four:** The Wildlife Site Review undertaken in 2019 was not fully completed due to the disbandment of the Essex Wildlife Partnership preventing its final endorsement. Consequently, the robustness of this Review and any changes arising from it were determined by the Inspector not to be justified. The schedule of Local Wildlife Sites in Appendix 4 has therefore been reverted to the outcomes of the Local Wildlife Site Review 2012, and any new sites or site extensions emerging from the 2019 Review are treated as potential Local Wildlife Sites.

5 Statutory Assessments

5.1 In order to comply with the legislative requirements, the following documents must be prepared to accompany the Local Plan:

- A Sustainability Appraisal and Strategic Environmental Assessment
- A Habitats Regulations Assessment
- An Equality Impact Assessment

5.2 These documents were prepared alongside the plan and were all updated in November 2021 to reflect the main modifications proposed at that time. These were subject to consultation alongside the main modifications and are available to view online: https://www.castlepoint.gov.uk/main-modifications-consultation

5.3 As part of his final report, the Inspector proposed four relatively minor amendments to the detailed wording of the main modifications where these were necessary for consistency or clarity. These were:

- **MM17** – amended wording to paragraph 10.33 to reflect the recent name change of the nearby Cottage Plantation to Valerie Wells Wood.
- **MM40** – amended wording to refer to Nationally Significant Infrastructure Projects rather than Nationally Strategic Infrastructure Projects.
- **MM88** – amended wording to include Canvey Island Rugby Club as a community facility under the schedule included within Strategic Policy HS6 Community Facilities.
- **MM56** – amended wording within criterion 4 of new Strategic Policy TP3 to delete some wording to be consistent with the Habitats Regulations

5.4 At paragraph 4 the report states that '*none of the amendments significantly alter the content of the modifications as published for consultation or undermines the participatory processes and the SA/HRA that has been undertaken'.*

5.5 For completeness, the authors of the Sustainability Appraisal and Strategic Environmental Assessment, and the Habitats Regulations Assessment were asked to review their reports in light of these minor amendments to ensure that the conclusions set out in their reports dated November 2021 remained valid. Letters have been received from both authors to confirm that this is the case. These letters are provided at Appendix 5 and Appendix 6 respectively.

5.6 To this end, the final Sustainability Appraisal and Strategic Environmental Assessment Report is that dated November 2021. Members are asked to note the content of that report.

5.7 Similarly, the final Habitats Regulations Assessment Report is that dated November 2021. Again, Members are asked to note the content of that report.

5.8 The Equality Impact Assessment (EqIA) was also updated in November 2021 and has also been reviewed in light of these additional amendments to the main modifications. None of the additional amendments to the main modifications made by the Inspector impact on equality or diversity issues, and therefore the EqIA published in November 2021 remains valid. Members are asked to approve the EqIA report dated November 2021.

6 Adoption

6.1 It is now for the Council to consider adoption of the new Castle Point Local Plan as set out in Appendix 3 and the approval of the Policies Map as set out in Appendix 4. The legislative framework for adopting the plan is set out in Section 23 of the Planning and Compulsory Purchase Act 2004.

6.2 The new Local Plan sets out the strategic and local policies that will govern planning decisions during the plan period up to 2033, unless, in a review of the plan (required within five years) some or all the policies are reviewed and updated. Planning law is clear that planning applications should be determined in accordance with the development plan (the new Local Plan) unless considerations suggest otherwise. Therefore, the new Local Plan is the main policy consideration. The new Local Plan will, on Adoption, replace the Castle Point Local Plan 1998 (saved policies 2007). The old Local Plan will cease to be a factor in the consideration of all decisions on planning applications from the adoption date. As the Plan has progressed, it has been referred to in reports on planning applications as a material planning consideration.

6.3 Adopting the new Local Plan will mean that the Council and Borough has an up-to-date development plan. It means that the Council demonstrate that it has a five-year housing land supply, and it will speed up delivery of new homes so that the council can meet the housing delivery test targets and avoid further buffers on its five-year housing land supply and the presumption in favour of sustainable development as set out in paragraph 11 of the National Planning Policy Framework.

6.4 Importantly, having an adopted local plan means that the Council is in the strongest position to defend against speculative and inappropriate development, particularly in the Green Belt. The development needs of the Borough during the plan period are met in the plan, and therefore, there are no requirements over and above the sites set out. **This is the strongest defence possible.**

6.5 An up-to-date plan ensures maximum control of planning decisions is retained by the Council. Where sites have been allocated, developers are expected to submit policy compliant proposals. Master plans and development briefs should also comply with the new Local Plan policies. This ensures that the requirements of the plan (such as levels of affordable housing and design quality), infrastructure requirements, and site-specific requirements are met. If they are not, and material considerations do not outweigh non-compliance, then the new Local Plan provides the defence the Council needs to negotiate compliance and on appeal.

6.6 The Inspector has not requested an immediate review of the new Local Plan. Whilst there is a requirement to review plans every five years from the date of adoption, avoiding the need to prepare a new local plan before then, means that the Council can focus on preparing and delivering supplementary planning documents (such as on developer contributions and affordable housing) and may only need to undertake a partial review of the plan within the five years. It is also a considerable cost saving, given that the guide cost for a brand new plan, could be similar to that of this plan, c£1.4 million.

6.7 **Finally, the new Local Plan adds certainty.** The Council has operated planning decisions with an out-of-date plan and has been heavily reliant on the NPPF in addition to the relevant saved policies. This new Local Plan, approved in October 2019 for examination, is the plan that has been determined locally. That decision has been proven to be correct, insofar as the Council approved

a plan that was, subject to modifications, sound. The modifications that the Inspector has made do not change the overall strategy. They have been made to strengthen policies to ensure that decision makers are best equipped to make correct and compliant decisions, whether they be officers under the scheme of delegation, the Development Management Committee or the Planning Inspectorate.

6.8 The certainty provided by the New Local Plan also positions the Council and its partners, such as Essex County Council as the Transport Authority, to bid for funding and secure investment in infrastructure projects. Having a Local Plan, and a clear idea of when and where growth may arise is a pre-requisite for many Government funding streams. Meanwhile, the Local Plan positions the Council to secure investment in infrastructure through S106 and CIL to a scale that is not possible in the absence of a plan as it enables the cumulative impacts development to be addressed.

6.9 **The recommendation is that the Council adopts the New Castle Point Local Plan to enable the Council to fully fulfil its obligations as the principal local planning authority for the area.**

6.10 If the Council agrees to adopt the new Local Plan, officers will prepare the final copy of the Local Plan document and the Policies Map. Both will be published in their final form on the Council's website. Copies will also be made available at advertised deposit points in accordance with regulations.

6.11 In order to complete with regulations officers have also prepared an Adoption Statement which is attached as Appendix 7. This will be published alongside the Local Plan document and Policies Map. The Adoption of the new Local Plan comes into effect on the date the decision to adopt the Local Plan is made. The Adoption Statement must be published as soon as possible thereafter.

6.12 Training will be provided to members on the new Local Plan. This will be compulsory for all those on, or substitutes for, the Development Management Committee. This will help Members familiarise themselves with the new Plan and key policies.

6.13 Members must note that there are powers of intervention invested in the Secretary of State under Section 21 of the Planning and Compulsory Purchase Act 2004. These can be found at Section 21. These are discussed below but, in simple terms, the Secretary of State has default powers to approve a plan even if a local planning authority is unwilling to adopt it.

6.14 The powers of the Secretary of State are set out in Section 21 is sub-section 4 of the 2004 Act:

'At any time before a development plan document is adopted by a local planning authority the Secretary of State may direct that the document (or any part of it) is submitted to him for his approval.'

6.15 If the Secretary of State decides to use section 21(4) and the Plan is submitted to him for his approval, the Council will not be able to take any more decisions

on the plan, unless that direction is withdrawn by the Secretary of State. This includes adopting the Plan at a later date.

6.16 There is a precedent in Essex of the Secretary of State approving a plan. In July 2017 the Secretary of State approved the Maldon Local Development Plan. The Plan came into effect on the day of his approval letter and the Council did not vote to adopt the plan.

6.17 Secretary of State approval of a local plan is not something that is to be taken lightly. For the Council it indicates that there is a failing in the ability of the Council to adopt a plan. For the Secretary of State, although the powers exist, it is seen as imposing on local decision making.

Appeals

6.18 During plan preparation a critical factor in demonstrating whether a site is developable, or deliverable is through discussion with prospective landowners and developers. The Council has established the Local Plan Delivery Board as a discussion forum to ensure that developers submit planning applications that accord with the Plan and can deliver, inter alia, the necessary infrastructure, highest quality standards and affordable housing. The formation of this board was a recommendation of the Development Control Peer Review.

6.18 In the event that the plan is delayed or not adopted, it is highly likely that the developers will continue with the preparation and submission of planning applications. Without an up-to-date local plan, there is a risk that the Council would decide to refuse planning permission. Developers will contend that there are very special circumstances to grant planning permission and appeal a decision to refuse.

6.19 The evidence that informed the current plan remains valid, as are the conclusions in the Inspector's report. The Inspector has examined the plan using this evidence and is satisfied that the evidence supports the plan and its soundness. Whilst the weight attributed to an Inspector's conclusions does not hold the same weight as an adopted plan, in the absence of an adopted plan and no five-year land supply, there is a risk of the evidence being used successfully by developers on appeal.

7 Financial Implications

7.1 The costs to date of the plan preparation are about £1.4 million, this includes the costs of the examination and the Inspector's report.

7.2 Should the local plan not be adopted, additional costs depend on what course of action the Council subsequently decide to take. If it was subsequently decided to prepare a new plan the Council will have significant costs to fund. The costs of doing so would be determined to a large extent by the policy direction the Council wishes the Plan to take. It is not possible to say what the estimated costs would be but the £1.4 million cost to date is a guide but would need to be adjusted for inflation.

7.3 In addition, a delay in the plan's adoption (and not having an up-to-date local plan in place), would lead to the increased risk of appeals, whether on sites allocated in the plan or speculative development elsewhere. The cost risks would relate to the costs the Council would incur in defending decisions and possibly developers' costs awarded against the Council. Whilst there will be an increase in fee income should major applications be submitted, that the net effect of that income would be substantially reduced by the potential appeal costs.

7.4 Every year, the Council's Section 151 Officer (Strategic Director, Resources) is required under section 25 of the Local Government Act 2003 to report on the adequacy of the proposed financial reserves, and this is done within the Policy Framework and Budget Setting Report.

7.5 Whilst a very small amount is allowed for as a provision for planning appeals, that envisages only the usual 'business as usual' type appeals rather than appeals on larger sites on 'allocated' or speculative development on non-allocated sites.

7.6 Consequently, if the Council does not have the reserves earmarked to meet an increase in appeal costs or the cost for an immediate review of the local plan, any significant use of the reserves could result in the Section 151 determining the proposed financial reserves are inadequate.

7.7 With reserves unavailable to fund the estimated costs, the Council would instead need to find new savings in order to balance the budget. Service areas have already, as part of the 2022/23 budget process, been identifying savings so that the existing budget gap of £1.2m (as reported in the Policy Framework and Budget Setting for 2021/22 report) can be closed.

7.8 The Council has already been identifying savings in anticipation of a very difficult budget round for 2022/23 and 2023/24 as reported to Council on 23 February 2022.

7.9 This is against the backdrop of the Council having already found permanent savings over several recent years to match the reduction of Government funding. There remain no easy or inconsequential options

7.10 The Council has a legal requirement to set a balanced budget, with a risk of significant Government intervention if there is or, in the opinion of the Section 151 officer, is likely to be an unbalanced budget.

8. Corporate Implications

(a) Financial Implications

These are set out in a main report

(b) Legal Implications

The Council has a statutory duty to prepare and maintain an up-to-date local plan. Sanctions of intervention are included within the Planning Acts as set out in the main report.

The local plan must be prepared in accordance with legislative requirements. The Inspector's Report concludes that the Plan complies with all relevant legal requirements.

The report also highlights the implications for decision making, appeals and ability to secure necessary infrastructure and affordable housing. In defending appeals, the Council may need legal representation.

There is also a risk of judicial review into any decision by the Council to not adopt the new Local Plan.

(c) Human Resources and Equality Implications
Human Resources

Work on the Castle Point Local Plan has been undertaken by a small but dedicated team of professional officers. Receipt of the Inspector's letter which finds the Plan sound, means that officers have succeeded in their responsibilities handed down by the Council in October 2019.

Non adoption of the plan will have an impact on staff resources and new staff requirements.

Equality Implications

The Local Plan is subject to an Equalities Impact Assessment (EqIA) at each stage and the latest version of the assessment was presented to Council on 24 November 2021. The EqIA concludes that:

'The Objectives and Policies of the New Local Plan have been comprehensively tested and analysed against the assessment questions previously identified in the EqIA scoping report's framework, in order to determine whether there are likely to be any socio-economic or equality impacts as a result of the Plan.

The analysis found the Objectives and Policies of the New Local Plan to meet the socio economic and single (integrated) equality duties of the Equalities Act 2010, and that there were no areas which needed to be changed or given further consideration in order for the Council to fulfil its duties under the Act.'

The Full EqIA report can be viewed online at:

https://www.castlepoint.gov.uk/main-modifications-consultation

(d) IT and Asset Management Implications

The Local Plan includes green belt releases of two parcels of land owned by the Council: The Former WRVS site in South Benfleet and land to the east of Kings Park Village.

9. Background Papers

As highlighted in the report

Report Author:

Ian Butt – Head of Place and Policy
Amanda Parrott – Planning Policy Manager
Lance Wosko – Manager of Financial Services

The Planning Inspectorate

Report to Castle Point Borough Council

by Philip Lewis BA(Hons) MA MRTPI

an Inspector appointed by the Secretary of State

Date: 3 March 2022

Planning and Compulsory Purchase Act 2004 (as amended)

Section 20

Report on the Examination of the New Castle Point Local Plan

The Plan was submitted for examination on 2 October 2020

The examination hearings were held between 11 May and 29 June 2021

File Ref: PINS/ M1520/429/6

Contents

Abbreviations used in this report 3

Non-Technical Summary 4

Introduction 5

Context of the Plan 6

Public Sector Equality Duty 7

Assessment of Duty to Co-operate 7

Assessment of Other Aspects of Legal Compliance 9

Assessment of Soundness 12

Issue 1 – Whether at the strategic level there are exceptional circumstances which justify altering Green Belt boundaries to meet development needs, and whether the Plan's Green Belt policies are effective? 12

Issue 2 – Whether the Plan makes adequate provision for new housing? 15

Issue 3 – Is the Plan positively prepared and would it be effective in addressing the likely accommodation needs of Gypsies, Travellers and travelling showpeople? 20

Issue 4 – Are the proposed housing allocations justified, effective and consistent with national policy? 21

Issue 5 – Is the strategy and provision for employment development effective and justified? 39

Issue 6 – Is the Plan period of 2018 – 2033 justified? 41

Issue 7 – Are the development management policies clear, justified and consistent with national policy and will they be effective? 43

Overall Conclusion and Recommendations 58

Abbreviations used in this report

ASELA	Association of South Essex Local Authorities
COMAH	Control of Major Accident Hazards
DtC	Duty to Cooperate
ECC	Essex County Council
HRA	Habitat Regulations Assessment
LHN	Local housing need
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
RAMS	Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy
SA	Sustainability Appraisal
SBC	Southend-on-Sea Borough Council
SCI	Statement of Community Involvement
SEA Regulations	Environmental Assessment of Plans and Programmes Regulations 2004
SEEDNA	South Essex Economic Development Needs Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SOCG	Statement of Common Ground

Non-Technical Summary

This report concludes that the New Castle Point Local Plan provides an appropriate basis for the planning of the Borough, provided that a number of main modifications [MMs] are made to it. Castle Point Borough Council has specifically requested that I recommend any MMs necessary to enable the Plan to be adopted.

Following the hearings, the Council prepared a schedule of the proposed modifications and, where necessary, carried out sustainability appraisal and Habitats Regulations Assessment of them. The MMs were subject to public consultation over an eight-week period. In some cases I have amended their detailed wording where necessary. I have recommended their inclusion in the Plan after considering the sustainability appraisal and Habitats Regulations Assessment and all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- To revise the local housing need figure to reflect changed input figures;
- To set a stepped housing requirement to reflect the likely delivery of homes in the plan period, and the significant uplift in housing land supply proposed which will take some time to deliver;
- To amend the Green Belt Policies so that unnecessary duplication is avoided and to make them effective;
- To delete Local Policy GB4 Limited Infill – Special Policy Areas as it would not be effective and is inconsistent with national policy for the Green Belt;
- To alter Policy HO7 Gypsy, Traveller and Travelling Showpeople to include a site allocation, so that the Plan makes provision to meet the specific need for Gypsies and Travellers arising in Castle Point during the plan period;
- To make detailed adjustments to particular site allocations;
- To delete the proposed allocation of employment land at the Manor Trading Estate, as exceptional circumstances have not been demonstrated for releasing the site from the Green Belt; and
- A number of other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

Introduction

1. This report contains my assessment of the New Castle Point Local Plan (the Plan) in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is compliant with the legal requirements and whether it is sound. The National Planning Policy Framework 2021 (paragraph 35) (NPPF) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.

2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The New Castle Point Local Plan submitted in October 2020 is the basis for my examination. It is the same document as was published for consultation by the Council in December 2019.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and /or not legally compliant and thus incapable of being adopted. My report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1, MM2** etc, and are set out in full in the Appendix.

4. Following the examination hearings, the Council prepared a schedule of proposed MMs and, where necessary, carried out sustainability appraisal (SA) and Habitats Regulations Assessment (HRA) of them. The MM schedule was subject to public consultation for eight weeks. I have taken account of the consultation responses in coming to my conclusions in this report and in this light, I have made some amendments to the detailed wording of the MMs where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and SA/HRA that has been undertaken. Where necessary I have highlighted these amendments in the report.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the Castle Point Local Plan Policies Map 2019 as set out in EXM-002.

6. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend MMs to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the Policies Map. In addition, there are some instances where the geographic illustration of policies on the submission Policies Map is not justified and changes to the Policies Map are needed to ensure that the relevant policies are effective.

7. These further changes to the Policies Map were published for consultation alongside the MMs, the Schedule of Modifications to the Policies Map November 2021 (PHD-002). In this report I identify any amendments that are needed to those further changes in the light of the consultation responses.

8. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted Policies Map to include all the changes proposed in the Schedule of Modifications to the Policies Map November 2021 and the further changes published alongside the MMs incorporating any necessary amendments identified in this report.

Context of the Plan

9. The New Castle Point Local Plan is proposed to replace the saved Policies of the Castle Point Borough Local Plan adopted in 1998. The Plan covers the whole Borough which has two distinct areas; Canvey Island and the 'Mainland', and will form part of the development plan for the area, with the Essex Minerals Local Plan and the Essex and Southend-on-Sea Waste Local Plan. Castle Point falls within the Metropolitan Green Belt which is tightly drawn around the urban areas. A significant proportion of the Borough at Canvey Island falls within Flood Zone 3, protected by sea defences and other flood

defence infrastructure. The port facilities at Canvey Island are nationally significant and have a role in ensuring the security of energy supplies in the UK. The Borough contains a number of Sites of Special Scientific Interest and a Habitats site, and is close to a number of other designated areas on the Essex Coast.

Public Sector Equality Duty

10. I have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This has included my consideration of several matters during the examination including the provision of gypsy and traveller sites to meet identified need, housing for older people, and the provision of accessible and adaptable housing.

Assessment of Duty to Co-operate

11. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.

12. The Council has published a Duty to Cooperate (DtC) Report which sets out how the Council sought to fulfil the duty in the preparation of the Plan. The DtC Statement is supported by Statements of Common Ground (SOCG) with Essex County Council (ECC) and a number of neighbouring Councils in Essex. In addition, a number of SOCGs have been made with prescribed DtC bodies and others.

13. It is clear from the evidence that substantial and effective co-operation has taken place between the Council and its neighbours, along with other prescribed bodies during the preparation of the Plan. Evidence of co-operation includes meetings of the Association of South Essex Local Authorities (ASELA), meetings with specific neighbouring Councils, and extensive joint evidence preparation for the emerging development plans in the area.

14. There is also clear evidence of the outcomes of cooperation. Of particular note is the preparation of a joint Strategic Housing Market Assessment (SHMA), an assessment of the needs of Gypsies, Travellers and Travelling Showpeople, an Economic Development Needs Assessment, a Retail Study, the South Essex Strategic Flood Risk Assessment and a Water Cycle Study, the Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) in respect of Habitats sites, the Essex Joint Health and Wellbeing

Strategy 2018-2022, and the Castle Point and Rochford CCG Localities Estates Strategy.

15. It has been argued by some representors that the Council did not cooperate with its neighbours in regard to the provision of a new access to Canvey Island. I am satisfied that although there is reference to such a scheme in the text of the submitted Plan, that was made on an aspirational basis, rather than as a proposal of the Plan. I have examined the Plan on the basis that it is not proposing a new access to Canvey Island, nor contains any strategic policy to that effect. I am satisfied therefore, that there is no failure of the duty in this regard.

16. Concerning other infrastructure provision, there is also substantial evidence of effective and on-going cooperation between the Council and the DtC bodies as reflected in the SOCGs, including with ECC, National Highways (formerly Highways England), Natural England, the Environment Agency, and Historic England.

17. It is clear that discussions have been held between local authorities in South Essex about how any unmet housing needs arising in one Council area may be accommodated in another. Whilst the Council had expressed concern to neighbours as to whether it could meet its local housing need at the start of the plan making process, the submitted Plan sets out to meet the housing needs arising in Castle Point in full. Consequently, the Council is not seeking neighbours to accommodate unmet housing need.

18. There is evidence that the Council and Southend-on-Sea Borough Council (SBC) have had constructive and ongoing discussions about potential unmet housing need, including a request from SBC to the Council to determine if it could reasonably meet any of the anticipated shortfall in the SBC area. There is common ground between the Council and SBC that it could not reasonably accommodate unmet need from SBC. Given the common issues, including establishing exceptional circumstances to change the boundaries of the Green Belt faced by the local authorities in South Essex, I heard that there is no agreement in place that any authority should take on unmet need from another within the South Essex area.

19. I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Other Aspects of Legal Compliance

20. The Plan has been prepared in accordance with the Council's Local Development Scheme.

21. Consultation on the Plan and the MMs was carried out in compliance with the Council's Statement of Community Involvement (SCI). A number of representations were received to the effect that the Council had not followed its SCI in the plan making process, that there were inadequate opportunities for people to make representations, and that the Council's consultation was ineffective. The submitted Plan however was published for formal consultation prior to submission in accordance with the Regulations and the opportunity to comment was provided. The same applies in respect of the consultation on the MMs.

22. The Council carried out SA of the Plan, prepared a report of the findings of the appraisal, and published the report along with the Plan and other submission documents under Regulation 19. The SA was updated to assess the MMs.

23. Whilst it has been queried as to whether the Council had invited representations on the SA of the submitted Plan at the Regulation 19 stage, as required by the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations), the Council, nevertheless, has undertaken further consultation and notification to the consultation bodies on the SA at the MM stage.

24. The SA of the Plan was carried out by the Council at the scoping stage, where the methodology was consulted upon, at the Regulation 19 stage, again prior to submission and at the MM stage. SA Objectives were developed from those used by the Council for previous development plans and were subject to consultation in the Council's Sustainability Appraisal Scoping Report.

25. In terms of the reasonable alternatives chosen in the SA process, I consider that they are realistic, and that the Council has provided an adequate outline of the reasons for selecting them. However, whilst options may be rejected as the Plan moves through various stages, and they do not necessarily need to be examined at each stage (see Calverton PC v Nottingham CC [2015] EWHC 1078 (Admin)), the SA should signpost clearly where the reasons for rejecting sites earlier in the Plan making process are set out. The SA has been amended to this effect at the MM stage.

26. It is clear from the submitted documents that the selection of reasonable alternatives in respect of housing allocations has been informed by the Strategic Housing Land Availability Assessment (SHLAA) process. A number of potential housing sites were rejected as reasonable alternatives by the Council and the reasons why they should be removed from further consideration are set out in the Draft Housing Sites Options Topic Paper 2018 (H-016). The SA (pre-submission plan version, SUS-002) in para 5.2.2 is clear that these sites had been omitted from the SA process. The Council later prepared a further version of the SA (SUS-007) taking account of their suggested main modifications to the Plan at the point of submission. This document includes an assessment of site S0137 as a reasonable alternative in response to representations received, despite it being rejected earlier. The SA has been further amended to clarify the position in respect of this site at the MM stage and I am satisfied that given the Council's original findings on that site earlier in the process, no 'retrofitting' of the SA has taken place.

27. In terms of strategic options for the supply of housing, I find the alternatives considered by the Council to be reasonable. Whilst it has been suggested that the Council should have considered an option where local housing need would be exceeded significantly, I do not consider such an option to be realistic. This is due to the identified constraints to development in Castle Point, including the Green Belt, flood risk and habitats sites. In addition, the Plan is proposing a significant boost to the supply of housing in Castle Point, and there is no robust evidence that provision of housing significantly exceeding the local housing need figure could actually be delivered in the plan period.

28. I conclude, therefore that SA has been carried out and is adequate.

29. The Habitat Regulations Assessment including Appropriate Assessment 2019 (EQ-009) and the Habitat Regulations Assessment Report including Appropriate Assessment Update 2020 (EQ-010) set out that Appropriate Assessment has been undertaken and that the Plan may have some negative impact which requires mitigation. The identified potential impacts on the integrity of European sites include recreational disturbance, habitat loss and loss of functionally linked land, and the effects on water quality and quantity. The HRA recommendations to address these impacts have been incorporated into the Plan. Further Habitat Regulations Assessment was undertaken in respect of the MMs (Habitat Regulations Assessment and Appropriate Assessment November 2021 (PHD-011) which concluded that no adverse effects on the integrity of European sites

would occur, subject to the recommended actions set out within the report being undertaken. Mitigation has been secured through the Plan (as modified by the MMs) in respect of a number of allocations.

30. Furthermore, a number of the development management policies set out HRA mitigation requirements. These include Strategic Policy SD1 Making Effective Use of Land and Creating Sustainable Places and Strategic Policy NE5 Ecologically Sensitive and Designated Sites which seeks contributions to the established RAMS.

31. Natural England made no objections to the HRA undertaken for the MMs. The HRA has been carefully examined, I find it to be robust and I am content that the Policies and allocations of the Plan will not affect the integrity of European sites.

32. The Plan includes policies to address the strategic priorities for the development and use of land in the local planning authority's area.

33. The Plan includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. In addition, the Plan identifies climate change as a strategic priority for the Plan as a whole. Specific relevant policies include Strategic Policy CC1 Responding to Climate Change; Local Policy CC2 Tidal Flood Risk Management Area; Strategic Policy CC3 Non-Tidal Flood Risk Management; Strategic Policy CC4 Sustainable Buildings and Strategic Policy NE1 Green Infrastructure and the Undeveloped Coast.

34. Appendix 7 lists policy changes from the Castle Point Local Plan 1998. To meet the legal requirement of Regulation 8(5) the Plan should be altered to make clear that the Policies of the 1998 Local Plan will be superseded (**MM1** and **MM87**).

35. The Plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Assessment of Soundness

Main Issues

36. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have

identified 7 main issues upon which the soundness of this plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy or policy criterion in the Plan.

Covid-19

37. The examination hearings took place during the Covid-19 pandemic. A number of comments have been made as to the potential economic and social effects of the pandemic. Whilst the immediate effects of Covid-19 are here for all to see, there is no evidence that the fundamental assumptions and requirements of the Plan in respect of housing need, or any other strategic matter, will be affected to the extent that its soundness will be undermined. Any longer-term effects which may arise can be addressed through subsequent local plan reviews, informed by evidence of the actual effects of the Covid-19 pandemic.

The Revised National Planning Policy Framework

38. The Government published a revised NPPF in July 2021 during the examination. The Plan should be amended to make the strategic priorities, vision and objectives consistent with the NPPF in respect of design, green infrastructure, biodiversity net gain and sustainable transport, and as a consequence of other MMs (**MM2**).

Issue 1 – Whether at the strategic level there are exceptional circumstances which justify altering Green Belt boundaries to meet development needs, and whether the Plan's Green Belt policies are effective?

39. Castle Point Borough falls within the Metropolitan Green Belt which is drawn tightly around the existing urban area in the Borough. The submitted Plan proposes that the Green Belt boundaries are altered at Benfleet, Daws Heath, Hadleigh, Thundersley and Canvey Island to accommodate housing development. It also proposes that some areas of land in educational use are removed from the Green Belt along with some areas of land which have been developed. New Green Belt is proposed on land to the west of Roscommon Way, Canvey Island. The NPPF sets out that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified.

40. Through the preparation of the Plan, the Council undertook a review of Green Belt boundaries. This adopted a methodology consisting of a number of stages. The methodology included splitting different parts of the Borough into separate parcels. Whilst there are no doubt different ways of doing this, the approach taken by the Council to the subdivision of the Borough was adequate. The resulting parcels are of a sufficiently fine grain to allow for meaningful comparisons to be made between them. The methodology for the Green Belt Review is clear and adequate.

The need for housing

41. The need for housing is discussed under Issue 2. Castle Point has a pressing housing need, issues with housing affordability and a serious shortfall in the provision of affordable homes. There is no scope for Castle Point to export housing need to another district; its neighbours are also significantly constrained and have their own significant development needs. The overall level of housing will address housing affordability and will provide more affordable homes. There is also an identified need for provision of accommodation for Gypsies and Travellers in Castle Point.

The supply and availability of land suitable for sustainable development

42. The Council has undertaken a thorough assessment of the availability of land within the urban area through its SHLAA 2018 (H-007 to 010) and the assessment of windfall sites. A total of 477 sites were considered and a design led approach was taken to determine their potential capacity, with higher densities assumed as appropriate, along with assessments of deliverability / developability as per national policy, and the assessment of viability. Additionally, through the large site capacity assessments (H-012 and H-013), the Council sought to optimise the capacity of proposed sites, including those in the urban areas. This work indicates that around 53% of the housing need could be met within the urban area (that is to say outside of the Green Belt). Therefore, it is not possible to rely on increasing the supply of housing within the urban area to avoid the need to alter the boundaries of the Green Belt to meet housing need.

Other changes to the Green Belt (not arising directly from proposed allocations)

43. The Plan seeks to remove a number of educational facilities and associated playing fields from the Green Belt. I am satisfied that there are exceptional circumstances for the removal of the Glenwood School site and the land at the Cornelius Vermuyden School from the Green Belt. This is because given the extent to which they are built up, it is unnecessary to keep these sites permanently open. Similarly, the built-up areas of the USP Canvey College Campus and the former Castle View School; Deanes School and Virgin Active, Hadleigh; and the King John School, Benfleet should be removed from the Green Belt. However, there are not exceptional circumstances for the removal of the playing fields associated with these schools from the Green Belt. The text should be amended to update the overall amount of the Green Belt which would be retained, and to confirm the schools affected (**MM67**). The Policies Map should be amended accordingly.

44. An area of land of about 10.9 hectares would be added to the Green Belt to the west of Roscommon Way adjoining the urban area at Canvey Island. The alteration of the inner edge of the Green Belt boundary would reinforce the strategic gap between Canvey Island and Stanford-le-Hope, whilst providing a more robust boundary to the Green Belt at Canvey Island. Although the land is part of a SSSI, given its former use, I am not convinced that normal planning policies and development management would be adequate to keep it open. There are therefore exceptional circumstances for including this land within the Green Belt.

Conclusion

45. In conclusion, there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet housing needs in the interests of the proper long-term planning of the Borough.

Issue 2 – Whether the Plan makes adequate provision for new housing?

Local housing need

46. The Plan has been prepared using the standard method for assessing local housing need as set out in the NPPF. The standard method provides a minimum starting point in determining the number of homes needed in an area. The submitted Plan sets out that the local housing need for the plan period calculated using the standard method is 5,130 homes. During the examination, the

Council recalculated the local housing need, rebased to 2021 and using the most recent workplace-based affordability ratio as per the Planning Practice Guidance (PPG). The updated capped local housing need figure for the plan period is 5,325 dwellings.

47. The PPG sets out that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. For example, where increases in housing need are likely to exceed past trends, due to growth strategies, strategic infrastructure improvements and an authority agreeing to take on unmet need from neighbouring authorities as set out in a SOCG.

48. In respect of unmet housing need, there has been no agreement by the Council to take on unmet need from a neighbouring authority set out in a SOCG. During the hearings, I heard that there has been no request from the Mayor of London for the Council to take on any unmet need arising from the Capital.

49. Whilst I heard about the high level of affordable housing need in Castle Point, national policy does not require that this is met in full through development plans. Additionally, I am not convinced that there is any effective housing demand over the level of local housing need, nor that an increase in the local housing need figure, say up to the uncapped level, would bring forward any significant additional affordable provision from market housing. Furthermore, I am satisfied that the affordability adjustment applied takes into account past under-delivery of housing as set out in the PPG. Consequently, it has not been demonstrated that actual housing need is higher than the standard method indicates.

50. National policy as expressed in the NPPF, or the guidance set out in the PPG, is not concerned with providing a lower housing need figure than that indicated by applying the standard method. The NPPF in paragraph 61 states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The standard method simply takes the household projections, applies an affordability ratio and an adjustment figure to arrive at the level of housing need.

51. The Addendum to the South Essex Strategic Housing Market Assessment (H-006) calculated the net affordable housing need at Castle Point to be 353 homes per annum. In comparison to the

capped Local Housing Need (LHN) figure of 355 homes per annum, this indicates an acute need for further affordable housing provision in the Borough.

The housing requirement

52. The NPPF in paragraph 11 b) says, amongst other things, that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, unless (i) the application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area, or (ii) the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.

53. With regard to paragraph 11(b)I, footnote 7 of the NPPF lists the policies that protect assets or areas of particular importance. Having regard to the evidence before me, which includes the SA, the HRA, the Green Belt Review, the Strategic Flood Risk Assessments and results of the sequential and exceptions tests, and Heritage Impact Assessments and archaeological evaluation report, I conclude that the application of policies in the NPPF that protect areas or assets of particular importance do not provide a strong reason for restricting the overall scale, type or distribution of development in the Plan area as a whole.

54. There was some discussion about the issue of flood risk at the hearings and a number of written submissions in this regard. In particular, I have taken into account the particular circumstances relating to Canvey Island, that much of it is at or below mean high tide level and that it is defended by formal raised sea defences. Furthermore, the Thames Estuary 2100 Plan (CC-004) sets out a policy for Canvey Island which is to take further action to keep up with climate and land use change so that flood risk does not increase for Canvey Island. I have also had regard to flood risk on the mainland part of the Borough. I am satisfied that given the technical evidence on flood risk and the mitigation measures proposed through the Plan as amended, that the proposed development in the plan is acceptable and should not be restricted specifically due to flood risk considerations.

55. Turning to paragraph 11 b) ii. I have also considered whether any adverse impacts of providing for objectively assessed needs for

housing and other uses would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole. The Plan in overall terms seeks to significantly boost the supply of housing, including affordable housing and housing for different groups in the community. In addition, it seeks to provide additional employment land and land for other uses. These are significant benefits.

56. There will however be harm arising from new development such as through the loss of countryside and Green Belt, increased urbanisation and increased pressure on transport systems. The Plan as modified has been subject to the iterative SA process, where potential benefits and harm were considered within the SA objectives, and includes a variety of mitigation measures including those arising from the HRA, provision of sustainable transport measures and specific measures set out in the allocations. Having considered carefully the evidence before me, I am satisfied that the adverse impacts of meeting the objectively assessed needs will not significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF taken as a whole.

57. The submitted plan proposes that the level of local housing need should form the housing requirement for the Plan. Whilst the updated LHN figure is higher than that set out in the submission Plan, the housing land supply proposed would meet the LHN with a small margin of headroom to afford some flexibility. The Council has recalculated the housing land supply taking into account the proposed MMs to be 5,510 homes for the plan period. This is marginally above the minimum objectively assessed need for housing of 5,325 homes.

58. The Plan is seeking to meet the local housing need for the plan period in full as per national policy. In doing so, it is consistent with paragraph 20 of the NPPF in making sufficient provision to meet identified needs for the plan period. In this regard, I am not convinced that to provide a level of development significantly above the minimum identified housing need would be justified, given the evidence before me. To seek to do so through this Plan would cause significant delay to its adoption, with of course, no guarantee that such a Plan would be found sound, and consequential delays in the delivery of much needed housing.

59. Strategic Policy HO1 Housing Strategy and the text of the Plan should be modified to confirm that the housing requirement for the

plan period is 5,325 homes (**MM5**). To avoid duplication with other Policies, Parts 2 and 3 of the Policy should be deleted. To be clear and effective, Part 4 of the Policy related to placemaking should be deleted (**MM5**) with this matter being addressed in an amended Strategic Policy SD1, which I deal with under Issue 7 below.

Would a stepped housing requirement be justified?

60. The Council in its hearing statement set out that the average delivery of homes in Castle Point in the past 10 years was 113 homes per annum. The present housing land supply is constrained by the Green Belt and other factors including the lack of an up-to-date development plan. Consequently, the new homes which have been delivered in recent years have typically arisen from urban intensification and regeneration. This is reflected in the latest housing delivery test result where only 49% of the new homes required in the past 3 years were delivered. The dwelling requirement for the Plan would be 355 homes per annum over the plan period. This represents a significant upturn in home building in the Borough. Additionally, there is already a shortfall in terms of housing delivery since the start of the plan period when measured against the requirement set out in this Plan.

61. Whilst there is evidence that new homes will continue to arise from urban intensification and regeneration through the plan period which are important components of the housing land supply, it will take some time for the proposed housing allocations of the Plan to come forward. This is because a number of the proposed allocations will remain in the Green Belt until the Plan is adopted, and it will take time for master plans, development briefs and planning applications to be prepared and considered, planning conditions and obligations to be discharged and construction to commence. Consequently, the significant increase in the supply of new housing is likely to take place later in the plan period.

62. Having regard to the evidence on the housing land supply and the deliverability of housing sites, the Plan should therefore include a stepped housing requirement which would still ensure that the overall housing requirement would be met in the plan period, but better reflecting the likely delivery trajectory of homes throughout the plan period. This should be a minimum of 291 homes per annum to 2026/27 and 430 homes per annum between 2027/28 and 2032/33 (**MM5**).

The supply of housing land

63. The Plan as amended should secure a supply of 5,510 homes over the plan period. This gives a small margin over the requirement to allow some flexibility. Overall, the housing supply is sufficient to provide a reasonable prospect that the requirement will be met.

64. Given historic delivery rates, the evidence set out in the SHLAA and the Brownfield Register, opportunities identified from town centre redevelopments, and schemes arising from prior approval processes, there is compelling evidence for a continued supply of a further 600 homes from windfall sites over the remainder of the plan period.

65. As a significant uplift from the rates of historic provision in Castle Point is necessary to meet local housing need and so provide a significant boost in the supply of housing in the Borough, and that such an uplift will take time to happen, it would be reasonable to recover this shortfall spread over the remaining plan period known as the Liverpool method. In reaching this view, I have had regard to the likely delivery of homes from the proposed allocations and the lead in times needed, particularly for sites proposed to be released from the Green Belt.

66. The five-year housing supply target at adoption is 1,872 homes. This figure is made up of 5 years of supply at 291 homes per annum, plus 105 homes as a proportion of the shortfall in the plan period to date, to which a 20% buffer is applied given the housing delivery test result.

67. Later in my report I set out my conclusions in respect of the soundness of individual allocations. Having regard to these, the Council's hearing statement and appendices, and the updated housing land supply documents and housing trajectory (H-026, H-027, H-028, H-029), I am satisfied that the Plan as modified will supply specific, deliverable sites for years one to five of the plan period after adoption. I am also satisfied that it should provide sufficient developable sites for years 6-10 as per paragraph 68 of the NPPF. Furthermore, I find that at least 10% of the housing requirement will be met on sites of less than one hectare, as per paragraph 69 of the NPPF.

Conclusion

68. The LHN for the plan period is 5,325 new homes. The LHN figure should be the overall housing requirement for the Plan. The housing requirement represents a significant uplift from past delivery rates of new homes and should be stepped as the bulk of the new homes proposed are projected to come forward later in the plan period. Against this stepped requirement, there would be a five-year supply of housing land on adoption of the Plan. The housing supply is sufficient overall to meet the housing requirement over the plan period.

Issue 3: Is the Plan positively prepared and would it be effective in addressing the likely accommodation needs of Gypsies, Travellers and Travelling Showpeople?

69. The updated Castle Point Borough Council Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTTSAA) (H-004) sets out an assessment of the need for the provision of additional pitches for Gypsies and Travellers. This includes those who meet the definition in Annex 1 of the National Planning Policy for Traveller Sites (PPTS), those who did not meet the PPTS definition, and for households whose need was unknown. No further accommodation needs are identified for Travelling Showpeople.

70. During the examination it was clarified that the identified need for permanent pitches for Gypsies and Travellers in Castle Point arises from the two established sites in the Borough. Since the GTTSAA was undertaken, the need arising from the site known as Janda Field has been addressed through the granting of planning permission on appeal for 6 additional static caravans on the 3 existing pitches at this site. The remaining need relates to a site known as Orchard Place. This is an area of previously developed land with sufficient space available to accommodate additional pitches to meet the identified need.

71. Orchard Place is situated in the Green Belt. Whilst it is previously developed land, the provision of further pitches is likely to have a greater impact on the openness of the Green Belt than the existing development. Consequently, any application for additional pitches would have to demonstrate very special circumstances through the development management process as the provision of new buildings in these circumstances is inappropriate development in the Green Belt. To be effective in providing for the future needs arising from

Orchard Place, Policy HO7 and the text should be amended so that the site is specifically allocated for Gypsy and Traveller accommodation only, and the site inset from the Green Belt (**MM10**). The Council is proposing to alter the Policies Map to this effect. Having regard to document EXM-042 – Note on Gypsy and Traveller Provision and Revised Policy HO7, I am satisfied that the specific accommodation needs for additional pitches arising from this site provides the exceptional circumstances to alter the boundary of the Green Belt.

72. Policy HO7 should also be amended to include that a project level HRA may be needed for certain proposals, consistent with the HRA undertaken for the Plan, and to ensure that the policy addresses the living conditions of future residents effectively (**MM10**).

Conclusion

73. Subject to the MMs discussed above, I am satisfied that the Plan is positively prepared and would be effective in addressing the likely accommodation needs of Gypsies, Travellers and Travelling Showpeople.

Issue 4 – Are the proposed housing allocations justified, effective and consistent with national policy?

Allocated site capacity assumptions

74. The proposed housing allocations each provide an indication of site capacity which has been used to inform the housing trajectory. So that the Plan is justified and effective, it is necessary to explain within the supporting text to the policies the basis upon which the capacity figures have been derived, and to confirm that the final dwelling figures delivered on specific sites would be established through the development management process (**MM12**).

75. So that the Plan would be effective, Policies HO9, HO10, HO11, HO12, HO13, HO14, HO15, HO16, HO17, HO18, HO19, HO20, HO21, HO22, HO23, HO24, HO25, HO26, HO27, HO28, HO29, HO30, HO31 and HO32 should also be amended to clarify that the indicative dwelling figure is not a maximum site capacity (**MMs 13** through to **MM36**).

Canvey Island and flood risk

76. There was some discussion at the hearings concerning the issue of flood risk at Canvey Island, which falls within Flood Zone 3, and is protected from tidal flooding by the presence of flood defences. The issue of access to maintain the existing flood defences and for their future strengthening is considered in Local Policy CC2 Tidal Flood Risk Management Area. I am satisfied that the sequential test is passed and the exceptions test is capable of being satisfied with the provision of the identified measures, for the proposed allocations at Canvey Island. Having regard to the tidal breach modelling and exceptions test results, to be effective Policies HO23, HO24, HO26, HO27 and HO31 should be amended so that it is clear that self-contained residential accommodation and bedrooms at ground floor level would not be permitted (**MM27**, **MM28**, **MM30**, **MM31** and **MM35**).

Local Policy HO9 Land west of Benfleet

77. The site is situated between the A130 Canvey Way and the existing built-up area and is well contained by these. It consists largely of open fields separated by hedgerows. The boundary of the Green Belt to the west is defined by the landscape planting along the A130, and a railway line to the southwest boundary, these are readily recognisable and are likely to be permanent.

78. Whilst the proposal would give rise to a loss of openness, given the location of the site and the provisions of the Policy criteria, the harm to the Green Belt would be minor overall. The Council has taken into account the need to promote sustainable patterns of development in the allocation of the site which is situated next to the existing settlement. In conclusion, taken together with the strategic level justification, exceptional circumstances exist to remove this site from the Green Belt for development.

79. There was some discussion at the hearing concerning the effects of the proposed allocation on air quality in the area. Having considered the evidence, I am satisfied that the proposed allocation would not give rise to any issues in respect of compliance with air quality limit values in the area. Additionally, I am satisfied that the proposed access arrangements for the site are achievable, are based upon adequate transport modelling and that there is no convincing technical evidence before me to suggest an unacceptable impact on highway safety or that residual cumulative effects on the road network would be severe.

80. To be effective, Policy HO9 and the explanatory text should be amended to clarify the master planning, health care, education, residential care home, drainage and sustainable transport requirements. The Policy and text should also be amended so that the requirements for biodiversity net gain and in respect of the Benfleet and Southend Marshes SPA would be effective (**MM13**).

Policy HO10 Land between Felstead Road and Catherine Road, Benfleet

81. The site consists of an area of woodland and sporadic residential development, with the land immediately to its west occupied by two schools adjoining the built-up area. The site adjoins the urban area to the south and partially to the north. Whilst the release of the land from the Green Belt would harm openness, the effect on the Green Belt purposes has been assessed in the Green Belt Review to be minor. The Green Belt boundary to the east would be defined by Catherine Road and to the north by London Road, these are readily recognisable and likely to be permanent. Although the proposed allocation would serve to reduce the gap between Benfleet and Thundersley, the alteration to the Green Belt boundary recognises the recent development along on London Road up to Catherine Road, and an appreciable gap would remain between the settlements. Taken together with the strategic justification, exceptional circumstances exist to remove this site from the Green Belt for development.

82. The proposed allocation includes a Local Wildlife Site (LWS). The proposed extension to this LWS is not justified (see Local Policy NE4 and **MM77**) and it has been replaced by a potential LWS. Any potential effects on the LWS/potential LWS would be addressed through the master plan as sought by the modified Policy (**MM14**).

83. To be effective, the Policy and text should be altered so that the requirements for a master plan, design principles, transport, drainage and green infrastructure are clear. Also, to ensure that access is provided to natural greenspace to divert and deflect visitors from Habitats sites and to reflect that the site consists of two distinct development areas (**MM14**).

84. The indicated site capacity derived from the Large Site Capacity Study update (H-013) is justified given the identified constraints and there is no convincing evidence that a higher site capacity should be set out in the Plan. Ultimately, that would be a matter for the

development management process. For clarity and effectiveness, the text however should be updated to reflect the current status of development built or otherwise committed within the site (**MM14**).

Local Policy HO11 Land off Glyders, Benfleet

85. The proposed allocation consists of agricultural land situated to the east of the existing urban area. The release of the site from the Green Belt would give rise to harm to openness and to the Green Belt purposes as set out in the Green Belt Review. However, the site is enclosed by existing development to the west and south, and along much of its northern boundary. A new Green Belt boundary would be formed to the east with a policy requirement for a landscape strategy to provide planting along the eastern boundary of the site. This would be readily recognisable and likely to be permanent. The provision of the strengthened boundary and the requirements of the Policy would serve to limit the harm to the wider Green Belt.

86. The site allocation proposed includes an area of ground extending to the east of the main body of the site to accommodate surface water storage infrastructure. Given that this can be achieved without harming the openness of the Green Belt, there are not the exceptional circumstances for the removal of this particular area of land from the Green Belt. The Policies Map should be updated accordingly as per document PHD-002. Overall, given the limited harm to the Green Belt and the need for housing which cannot be accommodated within the existing urban area, subject to my recommendations, there are exceptional circumstances for releasing the site from the Green Belt.

87. The proposed allocation is adjacent to the Benfleet and Southend Marshes Site of Special Scientific Interest (SSSI), which comprises an extensive series of saltmarshes, mudflats and grassland, and supports a diverse flora and fauna. The Policy and text should be amended to ensure that the adjacent SSSI is protected and enhanced consistent with paragraph 179 of the NPPF, and to be effective in safeguarding the nationally important site (**MM15**).

88. A number of matters were discussed at the hearing, including the issues of land stability, the presence of a high-pressure gas pipeline near the site, and how the site would be accessed. To be effective, the Policy and text should be amended so that the issues of land stability, drainage, site access and the proximity of the high-

pressure gas pipeline to the site are clearly addressed and mitigated. In addition, the Policy should be altered so that it would be effective in safeguarding Habitats sites. The recommended changes to the Policy are set out in **MM15**.

Local Policy HO12 Site of the former WRVS Hall, Richmond Avenue Benfleet

89. The proposed allocation consists of the former WRVS Hall site and a car park. Whilst the proposal would give rise to a loss of off-street parking, I saw at my site visit that parking on nearby streets is not subject to restrictions and there is no evidence before me of parking stress in the area. To be effective, the Policy and text should be amended so that it is clear that net gain in biodiversity should be measurable, to safeguard Habitats sites, and to set out the need for the management of tidal flood risks, sustainable drainage, and foul and surface water requirements. In addition, to be effective the Policy should be corrected to refer to the South Benfleet Playing Fields. The amendments are set out in **MM16**.

Local Policy HO13 Land east of Rayleigh Road, Hadleigh

90. The proposed allocation is comprised of predominantly open fields with internal boundaries marked by hedgerows. The site contains a farm and several other buildings and a reservoir, and falls partly within the designated Historic Natural Landscape under Policy NE2. The development of the site would cause harm to the openness of the Green Belt and some harm to its purposes as it would cause a loss of countryside and serve to reduce the strategic gap between Thundersley and Daws Heath. However, the site would be enclosed by existing development to the west, north and along much of its southern boundary. A new Green Belt boundary would be formed to the east of the allocation with the nature reserve. This would be readily recognisable and is likely to be permanent, maintaining a gap and preventing coalescence between Thundersley and Daws Heath.

91. Three additional areas of land would also be removed from the Green Belt as a consequence of the allocation. These consist of an area of built-up land adjacent to the A129, an area of land to the rear of dwellings on Daws Heath Road including residential gardens, and part of Daws Heath Road. However, given its largely developed character, the removal of this land from the Green Belt would not give rise to significantly greater harm beyond that arising from the allocation.

92. Whilst there would be harm to the Green Belt, the Policy requirements would serve to reduce that harm. Overall, given the need for housing which cannot be accommodated within the existing urban area, and subject to my recommendations, there are exceptional circumstances for releasing the site from the Green Belt.

93. The Policy and text should be amended so that it is clear that net gain in biodiversity should be measurable, that a buffer is applied to the neighbouring nature reserve, to ensure that Habitats sites are safeguarded, and to clarify the requirements for greenways to provide multi-user access so that it would be effective. In addition, to be effective, the Policy and text should also set out clearly the requirements for community facilities, for foul and surface water drainage and the provision of sustainable transport (**MM17**). Following the MMs consultation, I have amended the wording of paragraph 10.33 of the text to reflect the recent name change of the nearby Cottage Plantation to Valerie Wells Wood.

Local Policy HO14 Land at Brook Farm, Hadleigh

94. The proposed allocation is situated to the southeast of Daws Heath and consists of open fields divided by hedgerows, and the Brook Farm complex. The site is proposed to be removed from the Green Belt. The allocation would cause some loss of openness to the Green Belt and would serve to reduce the strategic gap between Hadleigh and Daws Heath. However, a reasonable gap of open Green Belt land would be retained between the two settlements which would maintain a clear physical separation between them and ensure development of the proposed allocation would not lead to their coalescence. The proposal would improve access to the adjoining Green Belt through the provision of multiuser greenways, which would include equestrian use. It would also include habitat improvement on adjoining land. These are compensatory improvements to the Green Belt. A new Green Belt boundary would be formed to the east and south of the allocation, partly following existing boundaries, with a policy requirement to secure mature planting along the southern boundary. This would be readily recognisable and likely to be permanent, preventing further encroachment into the countryside and the coalescence between Daws Heath and Hadleigh. Notwithstanding the harm to the Green Belt, I am satisfied that given the need for housing which cannot be accommodated within the existing urban area and potential for compensatory improvements to the Green Belt, exceptional circumstances exist to remove this site from the Green Belt for development.

95. The policy and text should be altered so that they are clear about the requirements for multi-user greenways, in achieving net gain in biodiversity including enhancements of adjoining land in the Green Belt and safeguarding Habitats sites, and for sustainable drainage, foul and surface water drainage, vehicular access and contributions to sustainable travel so as to be effective (**MM18**).

Local Policy HO15 Land at Scrub Lane, Hadleigh

96. The allocation is situated in the urban area and consists of open land adjoining a school. The Policy and text should be amended to set out the sustainable travel requirements and to ensure that Habitats sites are safeguarded so as to be effective. Additionally, to be consistent with national policy as set out in the NPPF in paragraph 99, the Policy should be amended to ensure that the loss of land formerly used as playing fields is mitigated appropriately (**MM19**).

Local Policy HO16 Land at Oak Tree Farm Hadleigh

97. The proposed allocation is situated to the east of Hadleigh and is close to the ancient woodland protected as the Great Wood and Dodd's Grove SSSI. The Policy and text should be amended so as to be consistent with paragraph 179 of the NPPF and to be effective in safeguarding the SSSI and Habitats sites. There was some discussion at the hearing about the access to the site. Subsequently, from the MM consultation I have become aware that some dwellings have been granted prior approval under Class Q of the Town and Country Planning (General Permitted Development) (England) Order, with access off Poors Lane. However, given the proximity of the SSSI, the Policy should be amended to be clear that vehicle access to the proposed allocation will be taken from Central Avenue only (**MM20**).

98. A small part of the site falls within Flood Zones 2 and 3 and the site has been considered through the sequential and exceptions tests. I am satisfied that the sequential test is met and that the exceptions test is capable of being met. The Policy and text should be amended so that they are consistent with national policy on flood risk as set out in the NPPF. The Policy should also be amended so that it is effective in respect of the provision of sustainable drainage (**MM20**).

99. The site would need to be released from the Green Belt. Whilst there would be some loss of openness and harm to some Green Belt purposes, including the encroachment of development into the

countryside, the provisions of the Policy would minimise that harm. The new boundaries of the Green Belt would be formed by existing field boundaries to the north and east and Poors Lane to the south, and would provide a physical screen to limit harm to the Green Belt. These would be readily recognisable and likely to be permanent. Notwithstanding the harm to the Green Belt, given the need for housing which cannot be accommodated within existing urban areas, exceptional circumstances exist to remove this site from the Green Belt for development.

Local Policy HO17 Hadleigh Island, Hadleigh

100. The site situated in Hadleigh town centre is currently occupied by a number of buildings. To be effective Policy HO17 should be amended so that the development brief requirements include sustainable transport provisions, access to natural greenspace to divert and deflect visitors from Habitats sites, and the safeguarding of access for the maintenance of drainage and utility infrastructure at the site (**MM21**).

Local Policy HO18 Land north of Grasmere Road and Borrowdale Road, Thundersley

101. The allocation site consists primarily of open land with hedges and trees within the Green Belt. The new boundaries of the Green Belt would be formed by existing field boundaries to the north and west, with the site being adjacent to the urban area to the south and east. The new Green Belt boundaries would be readily recognisable and are likely to be permanent. Whilst the development would cause loss of openness and some harm to Green Belt purposes, this harm would be reduced by the policy requirements to retain hedges and tree lined field boundaries wherever possible. Consequently, given the need for housing which cannot be accommodated within existing urban areas, there are exceptional circumstances for altering the Green Belt boundaries.

102. The Policy should be amended to ensure that the criteria relating to sustainable drainage, biodiversity net gain, access to natural greenspace to divert and deflect visitors from Habitats sites, and access and sustainable transport are clear and effective. Additionally, for effectiveness the Policy and text should be altered to address the retention of the public right of way which passes through the site (**MM22**).

Local Policy HO19 Land at Glebelands, Thundersley

103. The allocation relates to an area of open field and scrub land situated between the A130 road, and the urban area in Thundersley. The land is currently in the Green Belt. The removal of the site from the Green Belt would cause some loss of openness and minor harm to Green Belt purposes through the extension of the urban area and eroding the gap between South Benfleet and North Benfleet. However, a new boundary to the Green Belt would be formed by the A130 road representing a strong and recognisable boundary which is likely to be permanent, preventing further encroachment into the countryside and coalescence with North Benfleet. The existing schools to the north of the site consist of largely developed land which would also be removed from the Green Belt, along with some otherwise isolated areas of Green Belt comprising domestic gardens between the existing urban area and the proposed allocation site. Given the need for housing which cannot be accommodated within the existing urban area and the limited harm to the Green Belt, I find that there are exceptional circumstances for changing the Green Belt boundaries as proposed.

104. There was some discussion at the hearings concerning the vehicular access to the site and the effect of the development on the wider highway network. I am satisfied that the transport modelling for the Plan is robust and that there is no specific evidence that the proposed allocation would not have a safe or suitable access, nor that any significant impacts on the highway network could not be cost effectively mitigated to an acceptable degree. To be effective however, the Policy and text should be amended so that the requirements for sustainable transport, including that the transport assessment for the development of the site should include Tarpots Junction, are clear. This is to ensure that any significant impacts from the development on the transport network are assessed and appropriately mitigated. I have made a minor change to the MM to paragraph 10.65 as it was published for consultation, so that it would be clear and effective in this regard.

105. Additionally, the Policy should be amended to confirm the requirements for master planning, biodiversity net gain and to divert and deflect visitors from Habitats sites (**MM23**).

Local Policy HO20 The Chase Thundersley

106. The site consists of open fields, playing fields and some wooded areas, broadly situated between Hart Road and Kiln Road. Although

the land is largely enveloped by the existing urban areas of Thundersley, it is currently designated as Green Belt. It is proposed that the land is removed from the Green Belt which would cause some limited harm to the Green Belt through the loss of openness, increasing urban sprawl and loss of countryside. The site would have a short boundary with the Green Belt on the A129 Rayleigh Road which would be readily recognisable and is likely to be permanent. In addition, the Council has taken into account the need to promote sustainable patterns of development, which is reflected in the policy requirements. Given the need for housing which cannot be accommodated within the existing urban area and the limited harm to the Green Belt, I find that there are exceptional circumstances for removing this site from the Green Belt.

107. The NPPF sets out in paragraph 125 that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. The Council's Large Site Capacity Study update (H-013) identifies a potential capacity for the site of about 430 dwellings (gross). I am not convinced that a lower site capacity as proposed in the submitted Plan is justified on the basis of the site constraints and policy requirements, which do not appear to have been applied consistently with other proposed site allocations. The site capacity should be amended taking into account existing commitments, to be around 412 new homes net (**MM24**). The actual number of new homes provided however will be determined through the master planning and development management processes having regard to factors such as the site characteristic, infrastructure needs and the housing mix.

108. The proposed allocation would be subject to the preparation of a master plan, which is necessary given the complexities of the site. To ensure that the master plan would be prepared in a timely way so that the proposed development is able to come forward in support of the Government's objective of significantly boosting the supply of homes, the Policy should be amended so that the master plan requirements and the timescales for its preparation are clear, this is so that it would be effective. Additionally, the Policy should also be amended so that it is clear how the master plan would be used in the development management process (**MM24**). The increase in potential site capacity has implications for infrastructure provision, such as for education need arising from the development. This would be determined through the development management process when an assessment of need can be made at that point in

time. I have made a minor change to criterion 4 of the MM to the Policy to clarify that any applications received in advance of the master plan must incorporate the requirements of criterion 3 of the Policy as appropriate to any such proposals. This is to ensure that the Policy is consistent with national policy.

109. Given the character and appearance of the area, for effectiveness the Policy should be amended to be clear as to the urban design approach required in order to create an attractive, green, parkland environment, integrated into the existing landscape, whilst making effective use of land (**MM24**).

110. The Policy and text should be amended so that the necessary relocation of sports pitches would be consistent with national policy for existing open space, sports and recreational buildings as per paragraph 99 of the NPPF. To be effective, the Policy should be amended so that the requirements for contributions to community facilities and infrastructure, regarding net gain in biodiversity, the safeguarding of Habitats sites, and to retain public rights of way, are clear (**MM24**).

111. There was some discussion at the hearing regarding vehicular access to the various parcels of land which make up the site. For effectiveness in guiding planning decisions, the Policy and text should be altered so that it is clear that the main vehicular access would be from Kiln Road to the south of The Chase, and from Runnymede Chase or Rayleigh Road to the north of The Chase, but that there may be limited access taken from other roads to small pockets of development as appropriate (**MM24**). Taking limited access in this way from roads such as Hart Road could be considered in the development management process.

Local Policy HO21 Land fronting Rayleigh Road, Thundersley

112. This site is located within the urban area and is served by public transport. However, due to its location on Rayleigh Road, close to its junction with the A127 and opposite a retail park, there are high traffic flows in the area. As such there is a need for development on this site to support localised improvements to active travel and enable mode shift to public transport. To be effective therefore, the Policy and text should be amended so that the sustainable transport requirements are clear. For effectiveness and consistency with national policy, the Policy also requires reference to measures to

provide access to natural greenspace to safeguard Habitats sites (**MM25**).

Local Policy HO22 Land at Thames Loose Leaf, Kiln Road, Thundersley

113. Given the location of the site in the urban area, and the traffic flows in the area, the Policy and text should be altered so that the sustainable transport and surface water drainage requirements are clear and effective, and to ensure that the Policy would be effective in safeguarding Habitats sites (**MM26**).

Local Policy HO23 Land east of Canvey Road, Canvey Island

114. The site is situated on the western side of the urban area at Canvey Island in the Green Belt and is made up of open grassland and scrub. It is largely enclosed by the existing urban area and Canvey Road, with open land to the north. The site immediately adjoins the Scheduled Monument 'Roman saltern 260m southeast of Great Russell Head Farm, Canvey Island'.

115. The Roman Saltern is one of only four scheduled Roman salterns in the country and is one of two with upstanding archaeological remains. Whilst the principal significance of the heritage asset is from its archaeological interest, its setting makes an important contribution to its significance. It is situated within a landscape of open, former grazing marsh and open countryside to the west and north, allowing long distance views to the grazing marsh beyond the A130.

116. The inclusion of land immediately to the west and north of the scheduled monument within the proposed allocation would erode the appreciation of the saltern in an agrarian setting and obscure views to the grazing marsh, severing it from its landscape context. Given the role of tidal water in Roman salt production it is clear that this change in setting would result in a loss of significance. The site allocation should be altered by the removal of the northern field to safeguard the setting of the scheduled monument and the Policies Map altered accordingly. I am satisfied that the removal of this land would not affect the indicative dwelling capacity of the site, as that had assumed that this land would be used for public open space.

117. The proposed development however gives an opportunity to provide for the preservation and enhancement of the scheduled monument

and its setting, such as through a conservation strategy, archaeological work and the provision of interpretation. For effectiveness and consistency with national policy, the policy and text should be altered so that the protection and enhancement of the scheduled monument and its setting are secured through the master planning process (**MM27**).

118. The proposed access to the site would be from a new junction on the A130 Canvey Road, with access to the existing urban area being for non-vehicle modes of travel and emergency vehicles only. The provision of the access to the site west to Canvey Road should be undertaken in a way which would preserve the setting of the Scheduled Monument. Whilst not all of the land necessary for the provision of the access may be within the control of the site promoter, I am satisfied that the site can be delivered, using if necessary, the Council's statutory compulsory purchase powers. The Policy as submitted includes provision of a new vehicular access to the adjacent secondary school. Whilst the need for this access has been questioned at the MM stage, this matter can be dealt with through the master planning and development management processes. The policy should be amended so that the provision of access is considered through the master planning process (**MM27**).

119. There was some discussion at the hearings concerning flood risk as the site falls within Flood Zone 3, and is protected from tidal flooding by the presence of flood defences. I am satisfied that the sequential test is passed for the site and that the exceptions test is capable of being met.

120. The Policy and text should also be amended so that the provisions of the master plan in respect of biodiversity and designated sites, public open space, foul and surface water drainage and provision for community uses and infrastructure would be clear and effective (**MM27**). In addition, the phasing requirement set out in the submitted Policy as criterion 2 is not consistent with the NPPF in terms of the sequential and exceptions tests and should be deleted.

121. The inclusion of the northern field within the allocation is not justified as it would give rise to unacceptable harm to the Green Belt, through loss of openness and sprawl into the open countryside to the north of the urban area. For consistency with national policy, it should be removed from the allocation and be retained in the Green Belt. The provision of public open space on land to the north of the site allocation however would be compatible with the

purposes of the Green Belt and ensure that the land remains open. The scheduled monument and the existing field boundary would represent readily recognisable physical features to provide a clear new Green Belt boundary on the northern side of the site which, if strengthened by a landscape buffer, is likely to be permanent.

122. Whilst the development (as amended) would clearly reduce the openness of the area and encroach into the countryside, it would be mostly well contained by the existing built-up area. The removal of the northern field and the requirements of the policy for a strong landscaped buffer on the northern boundary and provision of public open space and new greenways would limit and mitigate impacts on other Green Belt purposes. Compensatory improvements would be provided to the Green Belt land to the north consistent with paragraph 142 of the NPPF. Given the need for housing which cannot be accommodated within the existing urban area, subject to the MMs recommended, there are therefore exceptional circumstances for altering the Green Belt boundaries in respect of the allocation.

Local Policy HO24 Land west of Canvey Road, Canvey Island

123. The proposed allocation is a broadly triangular area bound by Canvey Road, Northwick Road and Roscommon Way. The site is proposed for removal from the Green Belt. It is largely open with some existing development along Northwick and Canvey Roads. The site is also adjacent to the Grade II listed Dutch Cottage.

124. A proposed new Green Belt boundary would be formed by Roscommon Way. The Policy includes within the master plan requirements that a strong landscaped buffer would be formed on this boundary. The Green Belt boundary should therefore be well defined and is likely to be permanent. The proposal would give rise to some harm to the Green Belt as discussed in the Green Belt Review in terms of sprawl, and encroachment on the countryside and loss of openness. The site is however well contained by the road network and the impact on the wider Green Belt would be limited. Given this and the need for housing which cannot be accommodated within the existing urban area, there are therefore exceptional circumstances for altering the Green Belt boundaries.

125. The submitted Policy contained a phasing requirement relating to flood risk. This is not consistent with the NPPF in terms of the sequential and exceptions tests and should be deleted (**MM28**).

The Policy and text should be amended so that detailed heritage assessment work is secured through the master planning process and to ensure that the significance of the Grade II Listed Dutch Cottage and any archaeological remains would be safeguarded. In addition, the master plan provisions in respect of biodiversity and Habitats sites should be amended to make them effective (**MM28**).

126. For effectiveness, the Policy should also be amended to ensure adequate space is retained to allow for the maintenance of the Hill Hall Dyke and to allow for enhancements to flood defences (**MM28**).

Local Policy HO25 Land at Thorney Bay Caravan Park, Canvey Island

127. The proposed allocation relates to an existing caravan park. The park is in the process of being redeveloped from static caravans to park homes under existing consents. The proposed allocation is made to deal with any proposals that fall outside of the existing consents. In this regard, the Policy and text should be amended to be effective and so that the purpose of the Policy is clear.

128. Amendments to the Policy and text are also necessary so that it is effective in dealing with the following matters. The site is within close proximity to a Calor Gas terminal and parts of it are within an area where new development falling outside of the existing consents would not be permitted on safety grounds. The site also falls within 400 metres of the Canvey Water Recycling Centre and any new development should not be subject to unacceptable odour nuisance or prejudice the continued operation of the Water Recycling Centre consistent with the agent of change principle set out in the NPPF. There is also sewerage infrastructure which should be taken account of in new development. The site is in an area of flood risk and is adjacent to the existing sea defences and provision should be made for access to the sea wall for maintenance and any upgrading, and for the provision of sustainable drainage. New homes should be resistant and resilient to flooding. In addition, the Policy and text should be amended to clarify the requirements for biodiversity net gain, safeguarding Habitats sites, and the need for affordable housing and infrastructure contributions. The recommended amendments are set out in **MM29**.

Local Policy HO26 Land at the Point, Canvey Island

129. The proposed allocation relates to an area of existing employment land within the urban area. The site falls within Flood Zone 3, and is

protected from tidal flooding by the presence of flood defences. I am satisfied that the sequential test is passed and that the exceptions test is capable of being passed for the site. To be consistent with national policy, the Policy should also secure sufficient space for any future enhancements to the sea defences as per Local Policy CC2 and access for maintenance to existing infrastructure (**MM30**). In addition, to be effective, the Policy and text should be amended in terms of a requirement for a project level HRA and to safeguard Habitats sites, to reflect the findings of the HRA. To be effective, the Policy should be amended so that it is clear about the requirements for sustainable transport and links to green infrastructure and the coast (**MM30**).

Local Policy HO27 Walsingham House, off Lionel Road, Canvey Island

130. The site falls within Flood Zone 3 and is protected from tidal flooding by the presence of flood defences. I am satisfied that the sequential test is passed and that the exceptions test is capable of being passed for the site. To be effective, the Policy should be amended to be clear that sustainable drainage measures take into account the Canvey Island Six Point Plan and that suitable access is provided for maintenance of drainage and utility infrastructure. In addition, to be effective, the Policy should be amended so that it would safeguard Habitats sites through provision of access to natural green space (**MM31**).

Local Policy HO28 Land at the Admiral Jellicoe, Canvey Island

131. The allocation relates to the site of a former public house in the urban area. To be justified, the Policy and text should be amended so that the site capacity is changed from 40 homes to around 14 homes to reflect the changed planning status of the site. In addition, the requirements for a planning and development brief for the site are not justified and should be deleted. To be effective, the Policy should be amended so that suitable access is provided to foul water infrastructure and mitigation of any adverse impacts of the proposal on the foul water pumping station on future residents is provided (**MM32**). Additionally, to be effective, the Policy should also be amended to be clear that sustainable drainage measures should have regard to the Canvey Island Six Point Plan and so that it would safeguard Habitats sites through provision of access to natural green space (**MM32**).

Local Policy HO29 Land south of Haron Close, Canvey Island

132. Since the Plan was submitted, the Council has resolved to grant planning permission for a sheltered accommodation scheme comprising 24 apartments at the site. To be effective, the Policy and text should be amended to reflect this increase in site capacity. For effectiveness, the Policy should also be amended to be clear that sustainable drainage measures should have regard to the Canvey Island Six Point Plan, and to safeguard Habitats sites through provision of access to natural green space (**MM33**).

Local Policy HO30 Land at Haystack car park, Canvey Island

133. To be effective, the text should be amended to clarify the current planning status of this site as planning permission has been granted for a mixed-use scheme comprising retail units at the ground floor and 14 apartments above (**MM34**). For effectiveness, the Policy should also be amended to be clear that sustainable drainage measures should have regard to the Canvey Island Six Point Plan and so that it would safeguard Habitats sites through provision of access to natural green space (**MM34**).

Local Policy HO31 Land to the east of Kings Park Village, Canvey Island

134. The allocation site is an area of open grassland adjacent to the Kings Park Chalet and Mobile Home Park, located within the Green Belt. The Green Belt Review identifies that if developed, there would be some minor harm to Green Belt purposes on this site in respect of checking unrestricted sprawl and safeguarding the countryside. However, the boundaries of the site are well defined by the coastal wall to the north and the Canvey Heights Country Park, a reclaimed landfill site, to the east and are likely to be permanent. Whilst there would be some loss of openness and minor harm in respect of some Green Belt purposes, the requirements of the Policy should ensure that the harm would be minor.

135. So that the Policy is effective and consistent with national policy, the following changes are required. The site is in an area of flood risk and is adjacent to the existing sea defences, so provision should be made for access to the sea wall for maintenance and any upgrading, and for the provision of sustainable drainage. In addition, the Policy and text should be amended to clarify the requirements for biodiversity net gain and for a project level HRA consistent with the findings of the HRA. The development should also provide access to

the adjacent country park to be consistent with national policy on achieving healthy, inclusive and safe places. To be effective, the Policy and text should be amended to address the issue of potential contamination at the site in relation to the adjacent restored landfill site, to be clear that sustainable drainage measures should have regard to the Canvey Island Six Point Plan and so that it would safeguard Habitats sites through provision of access to natural green space (**MM35**).

Local Policy HO32 Land at 244 – 258 London Road, Hadleigh

136. The site is situated within Hadleigh town centre and is opposite the Grade I listed St James the Less Church. To be effective, the Policy and text should be amended to confirm the requirements for the development brief for the site, which are not adequately set out in the submitted Policy. This should include enhancements to the setting of the Grade I listed St James the Less Church and the requirement for archaeological evaluation in the period between the demolition of the existing buildings and the construction of new development as per the Heritage Impact Assessment; and provision for contributions towards sustainable transport and to safeguard Habitats sites through provision of access to natural green space (**MM36**).

Conclusion

137. The Plan is capable of meeting the local housing need subject to the proposed Green Belt alterations to provide for housing development. These alterations would have relatively limited impacts on openness and would not cause severe or widespread harm to the purposes of the Green Belt. The Green Belt housing sites would be adjacent to the urban area and would have localised effects on openness.

138. Overall, therefore, for the strategic reasons set out earlier in this report and the site specific reasons referred to above, I am satisfied that there are exceptional circumstances to justify removing the following areas of land from the Green Belt to facilitate the development proposed in Policy HO1: Land west of Benfleet, Benfleet (Policy HO9), Land between Felstead Road and Catherine Road, Benfleet (Policy HO10), Land off Glyders, Benfleet (Policy HO11), Land east of Rayleigh Road, Hadleigh (Policy HO13), Land at Brook Farm, Hadleigh (Policy HO14), Land at Oak Tree Farm, Hadleigh (Policy HO16), Land north of Grasmere Road and Borrowdale Road, Thundersley (Policy HO18), Land at Glebelands, Thundersley (Policy HO19), The Chase, Thundersley (Policy HO20),

Land east of Canvey Road, Canvey Island (Policy HO23) as amended, Land west of Canvey Road, Canvey Island (Policy HO24), and Land to the east of Kings Park Village, Canvey Island (Policy HO31). Furthermore, subject to my recommended MMs, the Plan would be effective in ensuring that each site is developed in an acceptable way.

Issue 5 – Is the strategy and provision for employment development effective and justified?

139. The SEEDNA(ER-002) considers future employment growth in South Essex for the period 2016 – 2036. The total employment land requirement for Castle Point for the period, including a supply side adjustment to take account of historic development rates and offsetting losses of employment land to other uses, is 9 hectares.

140. Strategic Policy EC1 of the submitted Plan proposes that there should be an additional 24 hectares of employment land over the plan period. Of the three sites proposed to be allocated by Local Policy EC2, the proposed extension to the Charfleets Industrial Estate of 10.5 hectares is under construction and there has been a technical start to construction of the site south of Northwick Road which has an area of 9.7 hectares. Numerically therefore, the employment land need as identified in the SEEDNA could be said to be met in full, and indeed comfortably exceeded, from these two sites alone, which are both situated at Canvey Island.

141. The submitted Plan also proposes that 3.7 hectares of new employment land are allocated to extend the Manor Trading Estate in Thundersley. This land is proposed to be removed from the Green Belt.

142. I have had regard to the proposed distribution of new employment land between Canvey Island and the 'Mainland' part of the Borough, and that the Council considers that there is not a reasonable alternative to the extension of the Manor Trading Estate to provide additional employment land on the Mainland. I have also taken into account that over 50% of the planned housing growth would take place in the Mainland and that the NPPF promotes sustainable travel.

143. I understand that vacancy rates on existing employment sites are low, and that existing employment land provision is predominantly

located at Canvey Island, due in part to the gas and oil receptor and storage facilities. However, I am not convinced that there is a need to seek a greater balance in the distribution of employment land within Castle Point. I acknowledge nevertheless, that there is an issue with the quality of some of the existing industrial areas, which is a matter addressed by Strategic Policy EC1.

144. The proposed allocation at the Manor Trading Estate would be accessed via the existing estate. However, given what I have read, heard and seen of the condition of the existing infrastructure at the Trading Estate and the level of investment needed to make the necessary improvements, I have serious reservations as to whether the proposed allocation would actually be delivered within the plan period.

145. The level of existing commitments of employment land is such that there is no numerical or qualitative need for additional employment land provision at a strategic level for the plan period. Furthermore, whilst the planning system should actively manage patterns of growth in support of the transport objectives of the NPPF, the proposal at the Manor Trading Estate is modest in scale, and any such benefits which may arise in this regard would be limited. Consequently, I am not convinced that exceptional circumstances for the alteration of the Green Belt boundary to accommodate the extension to the Manor Trading Estate, is adequately evidenced and justified.

146. Therefore, Strategic Policy EC2 and its explanatory text should be amended by the deletion of the proposed extension to the Manor Trading Estate as that is not justified or consistent with national policy in respect of the need to alter the boundaries of the Green Belt (**MM38**). The Policies Map should be altered accordingly. To be effective, Policy EC2 should also be amended to reflect the current planning status of the other proposed allocations; the extension to the Charfleets Industrial Estate and South of Northwick Road and to reflect the amended Use Classes Order (**MM38**).

147. To be effective, Strategic Policy EC1 and the explanatory text should also be altered to reflect the amended Use Classes Order and permitted development rights, to seek the retention of port and port related facilities at Canvey, to secure access by sustainable transport modes, and to ensure that new development can be integrated effectively with existing businesses as per paragraph 187 of the NPPF. The explanatory text should be amended so that the

employment land and sector requirements reflect the latest available evidence so as to be effective and justified (**MM37**).

Conclusion

148. Subject to these MMs, the Plan makes adequate provision for new employment land for the plan period and the strategy and provision for employment land are justified.

Issue 6 – Is the Plan period of 2018 – 2033 justified?

149. The NPPF in paragraph 22 sets out that strategic policies should look ahead over a minimum of 15 years from adoption to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. The Plan has been prepared with a plan period of 2018 to 2033 and therefore the strategic policies would look ahead around 11 years from adoption.

150. The South Essex Economic Development Needs Assessment (SEEDNA) (ER-002) considers the period 2016 – 2036 and identifies the need for the provision of additional employment land over this period. The Plan is proposing a level of employment land provision in excess of that required to 2036. Consequently, the provision of employment land proposed in the Plan would in effect meet the projected needs of the area beyond the plan period.

151. Turning to housing, I have concluded under Issue 2 above that the Plan identifies an adequate supply of specific, deliverable housing sites for years one to five after adoption, and specific developable sites for years 6 to 10 consistent with paragraph 68 of the NPPF. Furthermore, adequate provision of housing is made to meet the identified LHN until the end of the plan period, with a small excess providing some modest headroom.

152. It is clear from the evidence before me that to address the question of the provision of housing beyond 2033 would require significant additional work to be undertaken by the Council. This would require, amongst other things, updating of key parts of the evidence base, including a further assessment of strategic transport infrastructure, and a Green Belt Review. The undertaking of such additional work would cause significant delay to the adoption of the Plan, having a knock-on effect on the efforts of the Council to significantly boost the supply of homes, in an area where the 2021 housing delivery test measurement was 49%. Furthermore, the

Council is working with neighbours on the preparation of the South Essex Plan. That plan is to provide a high-level strategic framework for the distribution of development across South Essex beyond 2033.

153. It has been argued that the Plan should be subject to a requirement for a prompt review. However, given the extent of the housing and employment land supply which is provided by the Plan, and the legal requirement for Local Plan Policies to be reviewed to assess whether they need updating at least once every five years[1], regardless of the future progress of the South Essex Plan, amending the Plan to require its early review is not necessary to make it sound, despite the housing land supply not looking ahead 15 years on adoption.

Conclusion

154. To conclude on this matter, I therefore consider it pragmatic for an otherwise sound Plan, with the recommended amendments set out in this report, to proceed to adoption with a plan period of 2018 – 2033, despite not being in line with paragraph 22 of the NPPF in regard to the provision of housing. The plan period proposed is justified.

Issue 7 – Are the development management policies clear, justified and consistent with national policy and will they be effective?

Strategic Policy SD1 Making Effective Use of Land and Creating Sustainable Places

155. As submitted, Strategic Policy SD1 is concerned with making effective use of land. To be effective and consistent with national policy set out in the Revised NPPF, the Policy and text should be amended so that it is also concerned with creating sustainable places. In this regard, amended placemaking criteria based on those set out in the submitted Strategic Policy HO1 Housing Strategy should be included in Policy SD1. The Policy should also be amended so that it sets out the requirements for development proposals in regard to Habitats sites, consistent with national policy, and as recommended in the HRA. In addition, to be effective, and consistent with national policy, the Policy should be amended to set

[1] Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012

out that urban intensification and brownfield redevelopment are important land supply sources (**MM3**).

Strategic Policy SD2 Development Contributions

156. Policy SD2 and the text should be amended so that it is consistent with the tests for planning obligations as set out in paragraph 57 of the NPPF, and for effectiveness to clarify that the Infrastructure Delivery Plan identifies the infrastructure required to meet the demands of new development (**MM4**).

Strategic Policy HO2 Master Planning

157. Strategic Policy HO2 sets out a requirement for master plans, planning or development briefs. To be consistent with national policy as expressed in the revised NPPF, the Policy should be amended to refer to the National Design Guide and National Model Design Code, and to be effective, it should clarify that the Policy relates to those allocations made in the Plan. The Policy should also be amended to clarify the approach to be taken to the adoption of master plans/development briefs as Supplementary Planning Documents, and voluntary Planning Performance Agreements to be effective. These changes are set out in **MM6**.

Strategic Policy HO3 Housing Mix

158. Strategic Policy HO3 as submitted is not justified and would not be effective in specifying specific housing mix requirements by site size. The housing mix requirement for the area may change over time and a fixed proportion of 1 or 2 bedroom dwellings may not be suitable for particular sites, given their characteristics, viability considerations or local specific housing mix needs. Consequently, the policy would be inflexible and ineffective in addressing changing needs and requirements. The Policy and text should be altered so that it would be effective in providing for the housing needs of different groups in the community identified in the SHMA as, and when, it is updated throughout the plan period (**MM7**). Additionally, to be positively prepared and effective, the Policy should set out how the housing needs of older people would be met as part of the overall housing mix on sites (**MM7**).

Strategic Policy HO4 Securing more Affordable Housing

159. Strategic Policy HO4 sets out the approach to affordable housing. In order to address the affordable housing need identified in the SHMA,

the Policy sets out an affordable housing threshold of 40% for sites on the Mainland and different thresholds for different types of development at Canvey Island. The viability evidence indicates that it would not be justified to seek affordable housing provision from solely specialist accommodation for older people at Canvey Island, which should be made clear in the Policy. To be justified and effective, the affordable housing thresholds relating to Canvey Island should differentiate between flatted and non-flatted development to reflect the findings of the viability evidence. The affordable housing targets should relate to 10 dwellings or more, and be clear as to the mix between housing for rent and affordable home ownership, so as to be consistent with national policy as expressed in the NPPF. The text should be amended so that the Plan would be effective in respect of payment in lieu of on-site provision. These changes are set out in **MM8**.

Strategic Policy HO6 Caravan and Park Homes

160. There are several Caravan and Park Home sites in Castle Point which provide permanent residential accommodation. The Policy should be amended so that it includes a requirement for a project level HRA as appropriate to be consistent with national policy and to reflect the recommendations of the HRA for the Plan. To be effective and justified, the text should also be updated to reflect the present situation regarding the Thorney Bay site (**MM9**).

Local Policy HO8 Residential Annexes

161. Local Policy HO8 sets out development management criteria for the consideration of planning applications for residential annexes. The Policy as submitted would not be effective in respect of the provisions relating to ownership and is not consistent with national policy for the Green Belt, or planning obligations as set out in the NPPF. The Policy should be amended accordingly, so that it would be effective and consistent with national policy (**MM11**).

Local Policy EC3 Canvey Seafront Entertainment Area

162. Policy EC3 is concerned with the seafront area on Canvey Island which is a significant tourist attraction in the Borough. The Policy should be amended so that it is consistent with the Use Classes Order and include provisions for a project level HRA, for consistency with national policy, and to reflect the findings of the plan level HRA (**MM39**).

Local Policy EC4 Canvey Port Facilities

163. The ports on Canvey Island receive hazardous materials in the form of Liquid Petroleum Gas and BioLPG (Calor) and oil derived products, including aviation fuel. These port sites are designated as Control of Major Accident Hazards (COMAH) sites. I have no reason to dispute that these facilities are nationally significant and have an important role in securing national energy supplies. The current Health and Safety Executive (HSE) consultation zones show the potential scale and extent of any risk posed by the installations at present to the area. Parts of the residential area including areas of housing and the Thorney Bay Caravan Park fall within a HSE outer consultation zone.

164. Local Policy EC4 sets out to promote public safety in respect of hazardous materials handled at the port consistent with the NPPF in terms of safe places and public safety. The Policy also seeks to ensure that the level of hazard posed by the activities there does not unacceptably increase to local people. In doing so regard has been had to the prevention of major accidents and limiting their consequences, and whether additional measures for existing establishments are required so that risks to people in the area are not increased, as per the PPG.

165. The Policy seeks to make provision, where possible, to reduce risk in the future to local people, for example, where the nature of materials handled at the sites changes in the longer term, as may result from decarbonizing the economy. It does this by setting out that a change of hazardous materials handled should be in the national interest, and that there must be no unacceptable change in the level of hazard or risk. Such a scheme of national importance would fall within the Nationally Significant Infrastructure Projects consenting regime and be determined against the relevant National Policy Statements, rather than fall to the Council to determine against the provisions of this Plan. However, given the proximity of the facilities to the built-up area and the risk posed, I consider the national interest provision to be justified to promote public safety for local residents through the use of the land in the long term. I find no conflict with the NPPF in this regard.

166. Local Policy EC4 should be amended so that it is consistent with national policy in paragraph 188 of the NPPF to make it concerned with whether proposed development is an acceptable use of land, rather than the control of processes or emissions which are subject

to separate pollution control regimes. The Policy should also be amended to include provisions relating to the 'agent of change' principle as per paragraph 187 of the NPPF to be consistent with national policy. I have amended the proposed MM so that it correctly refers to Nationally Significant Infrastructure Projects.

167. For effectiveness, the Policy should be amended so that it is clear how proposals for development at the port relating to existing and new activities should be assessed. The Policy should include provision for a project level HRA consistent with national policy and to reflect the findings of the plan level HRA, and to be consistent with national policy in respect of flood risk. The references to the Nationally Significant Infrastructure Projects procedures should also be clarified. These changes to the Policy and text are set out in (**MM40**).

Strategic Policy TC1 Town Centre Strategy, Local Policy TC3 Local Shopping Parades, Local Policy TC4 Out of Centre Retail Parks and Local Policy TC5 South Benfleet Leisure Quarter

168. The Borough experiences obesity levels appreciably higher than those nationally. To enable and support healthy lifestyles consistent with paragraph 92 of the NPPF, Policies TC1, TC3, TC4 and TC5 and the text should be amended to require health impact assessments for proposals for development involving the sale of foodstuffs. Also, to be effective and consistent with national policy, the Policies should be amended to reflect the recent changes to the Use Classes Order (**MM41**, **MM43**, **MM44**, **MM45**).

Local Policy TC2 Canvey Town Centre and Hadleigh Town Centre Regeneration

169. To be effective, the reference to the Hadleigh Town Centre Master Plan should be deleted from part 3 of Policy TC2 (**MM42**).

Strategic Policy TC6 Fast Food Outlets

170. Strategic Policy TC6 seeks to manage the provision of fast-food outlets within town centres and shopping parades. Having regard to the Council's Retail and Leisure Study (ER-008) and Shopping Frontages Assessment (ER-011), the thresholds set out in the Policy are justified and necessary to ensure the vitality of these centres. Whilst it is acknowledged that there is evidence that obesity levels in Castle Point are higher than the national average, there is not the Castle Point specific evidence to justify the exclusion of new hot

food takeaways within 400 metres of new and existing schools, colleges and youth centres outside of town centres. Accordingly, that requirement should be deleted. The Policy should however be amended to require Health Impact Assessments in respect of proposals for fast food outlets to enable and support healthy lifestyles consistent with paragraph 92 of the NPPF. These changes to the Policy and text are set out in (**MM46**).

Strategic Policy HS1 Strategy for Healthy Communities

171. To ensure that the Policy is effective, it should be amended to refer to access to the coast which is a key amenity resource in the Borough. The Policy should be amended so that development has regard to Sport England's Active Design Principles, rather than incorporate them. To make the Policy effective, criterion dii should refer to Policy NE7. Whilst I find that the thresholds for Health Impact Assessments set out in the submitted Plan are sound, to be effective, the requirements for Health Impact Assessments should be extended to all development for the sale of foodstuffs, consistent with the Town Centre Policies. These changes to the Policy and text are set out in (**MM47**).

Strategic Policy HS2 Opportunities for Indoor Leisure and Sport

172. To be effective, the Policy and text should be amended to clarify the community sports hall provision requirements, where community use agreements would be sought, and how provision for indoor leisure and sport would be secured (**MM48**).

Strategic Policy HS3 Opportunities for Outdoor Recreation

173. To be effective, Policy HS3 should be altered to refer to the Council's Playing Pitch Assessment and Strategy which establishes the need for outdoor recreation facilities, to clarify the requirements for new and improved ancillary features, to ensure that residential amenity is considered in new development and to clarify the HRA requirements to safeguard Habitats sites (**MM49**).

Strategic Policy HS4 Education, Skills and Learning

174. The Policy and text should be amended to ensure that it would be effective and clear in the provision of new or enhanced education facilities by clarifying when additional facilities would be sought (**MM50**).

Strategic Policy HS5 Health and Social Care Provision

175. The Policy and text should be amended to ensure that it would be effective and clear in the provision of health and social care and the use of planning obligations (**MM51**).

Strategic Policy HS6 Community Facilities

176. The Policy and text should be amended to make it effective by making clear that the existing community facilities are illustrated on the Policies Map, referring to the requirements for planning obligations under Policy SD2, and to require project level HRA as appropriate to safeguard Habitats sites (**MM52**). For effectiveness, the Plan should be altered to include a schedule of the community facilities designated under the Policy. The Canvey Island Rugby Football Club was omitted from the schedule published for consultation in the MM consultation. I have amended the schedule to include the Rugby Club (**MM88**). The Policies Map should also be amended in this regard.

Local Policy HS7 Open Spaces, Allotment Gardens, and Playing Fields associated with Educational Uses

177. To be effective, Policy HS7 should be amended to make it clear that a reduction in open space should not have an unacceptable effect on the character of the area, and to require project level HRA as appropriate to safeguard Habitats sites. The Policy should also be altered so that the provisions relating to the development of open space, allotment garden or playing fields are consistent with national policy as set out in the NPPF. The text should be amended to refer to the Castle Point Playing Pitch Assessment and Strategy (2018) to be effective. These changes are set out in **MM53**. The schedule of open spaces set out in Appendix 3 should be amended to delete Runneymede Paddocks as its inclusion is not justified (**MM83**).

Strategic Policy TP1 Transport Strategy

178. Policy TP1 sets the overall transport strategy for the area. To be effective, it should be amended to require project level HRA as appropriate to safeguard Habitats sites (**MM54**).

Local Policy TP2 Improvements and alterations to Carriageway Infrastructure

179. The submitted Plan, in Local Policy TP2, identifies a number of transport schemes. Some of these would be delivered within the Plan period and are associated with development proposed in the Plan, whilst a number of others would be safeguarded. In addition, the text refers to other transport schemes which are not subject to Policy TP2.

180. I have read and heard much about the existing transportation issues facing the residents of Castle Point. This includes traffic congestion, the nature of the main road routes and the limited number of routes between Canvey Island and the Mainland, the limited provision of sustainable alternatives to the use of the private car, and the presence of two top tier COMAH sites at ports of national importance to fuel supply.

181. I am satisfied that given the technical evidence, the level of growth proposed in the Plan is such that any significant impacts which would arise from it on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. There is no convincing evidence to the contrary.

182. Some representors have argued for a higher level of provision of new housing through the Plan. However, it has not been demonstrated that a significantly higher level of growth can be accommodated within the plan period without causing significant impacts on safety and efficiency of the transport network, which could be successfully mitigated.

183. The submitted Plan is not clear in the way in which it addresses strategic highway improvements, containing both improvements necessary to support the growth proposed in the Plan, and a number of schemes, which whilst not actually proposed in the Plan, are included as long-term aspirations. The approach taken in the Plan to this matter is confused, unclear, is not justified, and would not be effective, as discussed below.

The Extension to Roscommon Way (Phase 3).

184. A route for this road scheme is shown on the submitted Policies Map and the Plan proposes to safeguard this through Local Policy TP2.

This scheme is not critical in developing infrastructure to widen transport choice or to realise opportunities for large scale development, and there is not robust evidence for the proposed route to be safeguarded in the Plan. Furthermore, I am not convinced by the evidence that the scheme as outlined would be achievable, especially given the existing land uses along the route. The scheme should be deleted from the Policy and a route for the scheme should not be included on the Policies Map.

185. To be effective, Policy TP2 and the text should be amended to relate to those schemes necessary to support growth during the plan period, set out how these would be secured and to require project level HRA as appropriate to safeguard Habitats sites (**MM55**).

New Access for Canvey Island

186. Table 14.1 of the Plan includes a scheme for a new access to Canvey Island, crossing Holehaven Creek to the Mainland. However, this scheme is not a proposal in this Plan and no safeguarding provisions are proposed. Consequently, it was not subject to SA or HRA. The inclusion of the scheme in the Plan in this way is not clear and has created some confusion and concern about its status. Although the scheme is listed in the Plan it is not proposed as a policy and I have not assessed its merits.

187. The Council has been having discussions with some DtC Bodies about new or improved access to Canvey Island for a number of years. There is also an agreement with ECC to undertake a Canvey Study to assess potential access arrangements and improvements to access for Canvey Island.

188. To make the Plan effective in respect of transport matters relating to Canvey Island, a new Strategic Policy concerned with achieving new and improved access to Canvey Island should be included in the Plan, to set out that the Council will undertake a feasibility study to identify options for improving access to and from, and within Canvey Island, in collaboration with DtC bodies. The results of that study would inform the future review of the Plan. The Policy should also set out the requirement for an assessment under the Habitats Regulations. These changes to Policy and the text of the Plan are set out in **MM56**. Following the MM consultation, I have amended criterion 4 of new Strategic Policy TP3 by deleting some wording so that it is consistent with the Habitats Regulations and to be effective. This matter was discussed at the hearings and reflects

the approach set out in Strategic Policy SD1. Consequential renumbering of Policies in the TP series resulting from this new Policy is necessary (**MM57** to **MM62**).

Local Policy TP3 Improvements to Footpaths, Bridleways and Cycling Infrastructure

189. To make the Policy effective, it and the text should be amended so that it relates to active travel infrastructure, clarifies that all routes should be attractive and well-designed consistent with the NPPF, clarifies cycling infrastructure requirements and require as project level HRA as appropriate to safeguard Habitats sites (**MM57**).

Strategic Policy TP4 Improvements to Public Transport Infrastructure and Services

190. To be effective, the Policy should be amended to confirm how schemes would be funded and to include a criterion regarding necessary improvements to Benfleet Railway Station (**MM58**).

Strategic Policy TP5 Highway Impact

191. The Policy and text should be amended so that the requirements relating to transport assessments and highway and junction capacity are consistent with national policy as set out in the NPPF, and to clarify how schemes would be funded, to be effective (**MM59**).

Strategic Policy TP6 Safe and Sustainable Access

192. To be effective in improving sustainable transport options, the Policy and text should be amended so that access to public transport should be provided within 400 metres of a site, equivalent to a five-minute walk, and encourage non-car modes of travel (**MM60**).

Strategic Policy TP7 Parking Provision

193. To be effective, the Policy should be amended to clarify how the need for parking provision would be assessed (**MM61**).

Strategic Policy CM1 Communications Infrastructure Strategy

194. Part 2 of the Policy as submitted is concerned with the provision of telecommunications infrastructure in new development. These matters are dealt with by the Building Regulations and should be deleted (**MM63**).

Green Belt Policies

195. A number of policies relating to the Green Belt are included in the submitted Plan. Strategic Policy GB1 Green Belt Strategy and the reasoned justification should be amended to remove duplication with national policy as set out in the NPPF and for it to be effective (**MM67**). Strategic Policies GB2 New Development in the Green Belt, GB3 Extensions and alterations to, and Replacements of Buildings in the Green Belt, GB5 Change of Use of Buildings and Land in the Green Belt and GB8 Enclosure and Boundary Treatment in the Green Belt and Local Policy GB6 Ancillary Buildings and Structures in the Green Belt, and the reasoned justification should be amended and combined as Strategic Policy GB2 Development in the Green Belt, so as to avoid unnecessary duplication, address inconsistency with national policy, and to make them effective (**MM68**). The NPPF in paragraph 142 includes that plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. This is achieved through specific policy requirements on a number of the proposed allocations, and through Strategic Policy GB3 Positive Uses in the Green Belt (as amended).

196. Local Policy GB4 Limited Infill and Self-Build – Special Policy Areas, would not be effective, as whilst the Policy would support new dwellings within the defined areas of the Green Belt, the submitted policy as worded is inconsistent with the NPPF, and given the character and pattern of development within the identified areas, in many cases, proposals for new buildings within these areas are likely to constitute inappropriate development as they would fall outwith the exceptions defined in paragraphs 149 and 150 of the NPPF. Local Policy GB4 should be deleted (**MM69**).

197. Strategic Policy GB7 Positive uses in the Green Belt is not clearly written and unambiguous so it is evident how a decision maker should react to development proposals, and it should be amended to make it effective and renumbered as a consequential change (**MM70**).

Strategic Policy DS1 General Design Principles

198. The Policy should be amended so that it is clear that part 1 of the Policy relates to the urban area, rather than the Green Belt, where the specific Green Belt policies apply, so that it is effective. The

Policy should also be amended so that it is consistent with national policy as set out in the NPPF in respect of beautiful and sustainable design, for effectiveness refers to the Essex Design Guide, and includes criteria on flood resilience and drainage and adjoining land uses. These changes and changes to the text are set out in **MM64**.

Strategic Policy DS2 Landscaping

199. To be effective and to be consistent with the NPPF, the Policy should be amended so that the requirements for the provision of trees and tree lined streets are clear. A criterion should be added in regard to tackling climate change so it is consistent with national policy as set out in the NPPF (**MM65**).

Strategic Policy DS3 Advertisements

200. To make the Policy effective, the policy requirements should be amended to make them clear, and to remove repetition between parts of the Policy (as set out in **MM66**).

Local Policy CC2 Tidal Flood Risk Management

201. Canvey Island falls within Flood Zone 3 and is protected from tidal inundation by sea defences. There is a very small probability that these defences may be breached or over topped. Whilst this probability is very small, it is however necessary for the Policy to be amended to ensure that safe refuge areas should be provided in development of self-contained residential accommodation at ground level, and that buildings are hydrostatically and hydrodynamically resistant to prevent damage to their structure to enable them to be brought back quickly into use after a flood event. These changes are necessary so that the Policy would be effective and consistent with the NPPF. The Policy should also be amended to include the need for the exceptions test to be passed where appropriate for consistency with national policy. These changes are set out in **MM71**.

202. The Thames Estuary 2100 Plan (CC-004) recognises the need to maintain and enhance the sea defences over the next 50 years to deal with the effects of climate change. To be effective, the Policy and text should be amended so that the requirements for land to be safeguarded for these purposes is clear, and to set out that specific land requirements would be determined on a case-by-case basis.

203. There was some discussion at the hearing about the identification of a safeguarded area in relation to the maintenance and improvement of the sea defences, and the size of that in relation to the separate requirements for Flood Risk Activity Permits. It is appropriate and justified to identify the 19 metre deep zone for this purpose, provided that the Policy is clear and sufficiently flexible that the actual requirements for land to access the sea defences for works would be determined through the development management process. To be effective, the text should explain the relationship between the Town and Country Planning and the Environmental Permitting requirements relating to works near sea defences (**MM71**).

Strategic Policy CC3 Non-Tidal Flood Risk Management

204. To be effective, Policy CC3 and the text should be amended to be clear that it relates to areas at risk of flooding in 1 in 100 year events and to clarify access requirements for maintenance in respect of main rivers and surface water drainage requirements. The sequential and exceptions test requirements should also be altered to be consistent with national policy as expressed in the NPPF (**MM72**).

Strategic Policy CC4 Sustainable Buildings

205. Policy CC4 includes that all new development should achieve high levels of water efficiency. At the hearing, the Council argued for the application of the optional water efficiency requirement set out in part G2 and Regulation 36(2)(b) of the Building Regulations, which is currently 110litres/person/day. The findings of the South Essex Water Cycle Study (CCC-003) highlight the need to achieve water efficiency and therefore reduce demand, to address a predicted future deficit in water supply. Whilst the study was prepared some time ago, there is no alternative evidence before me.

206. Although the application of the higher Optional Technical Housing Standard for water consumption would have a modest cost implication for developers, I am satisfied that it would not have a significant effect upon viability, given the low cost per home to achieve the standard. Therefore, the application of the higher Optional Technical Housing Standard for water consumption is justified. Policy CC4 should be amended so that it is consistent with national policy as expressed in the NPPF in respect of impacts on climate change, efficiency requirements and materials, and to be

effective, duplicated text within the Policy should be deleted. These changes are set out in **MM73**.

Strategic Policy NE1 Green Infrastructure and the Undeveloped Coast

207. To be effective, Policy NE1 and its supporting text should refer to blue infrastructure in addition to green, given that blue infrastructure is a fundamental part of the natural environment in Castle Point. To be consistent with national policy in the NPPF, the requirement for biodiversity net gain should be amended. In addition, the Policy should be amended to require a project level HRA to safeguard Habitats sites as per the findings of the HRA and to be effective (**MM74**).

Local Policy NE2 Protection of Historic Natural Landscape

208. For effectiveness, the Policy should be amended so that it is clear as to how it would be applied in the development management process in protecting and enhancing landscapes, and to ensure that the levels of protection afforded to heritage assets are consistent with national policy (**MM75**).

Local Policy NE3 The South Canvey Green Lung

209. The submitted Plan includes the 'South Canvey Green Lung', which Local Policy NE3 seeks to protect from development, and supports the creation of new habitats. The designation seeks to maintain separation between the existing Oil and Gas storage facilities and residential areas, and maintain the openness of the area and its landscape value, and identifies the area as a wildlife corridor.

210. I do not find that the designation is justified on landscape grounds. However, the area subject to Local Wildlife and Potential Local Wildlife Sites designations provides a wildlife corridor in South Canvey. As such, I am satisfied that the designation of the land as a wildlife corridor is justified and the Policy should be amended accordingly (**MM76**).

Local Policy NE4 Local Wildlife Sites

211. The submitted Plan identifies a number of proposed extensions to the existing designated Local Wildlife Sites. However, there is not robust evidence to justify the proposed sites/extensions to sites at Poors Lane, Kents Hill Wood, Coombe Wood and Brickhouse Farm.

The evidence however is sufficient to warrant the identification of these areas as Potential Local Wildlife Sites to be considered for designation at a later date, when more robust evidence may be available. The text should be amended accordingly (**MM77**). If Potential Local Wildlife Sites were to be considered suitable for designation in due course, they could be incorporated into the development plan through a review of this Plan. The Council has proposed the changes to the Policies Map which should be made on adoption of the Plan. The Policies Map changes consultation has revealed inaccuracies in respect of the boundary of the designated Brickhouse Farm LoWS which should be corrected by the Council on adoption of the Plan.

212. Policy NE4 should be amended so that it is consistent with the NPPF in respect of net gains in biodiversity. To be effective it should also be amended so that it is clear in respect of avoidance of harm to sites, mitigation and compensation requirements (**MM77**). The tables of Local Wildlife Sites and Potential Local Wildlife Sites in Appendix 4 should be altered as a consequence of MM77. This is set out in **MM84**.

Strategic Policy NE5 Ecologically Sensitive and Designated Sites

213. To be effective and consistent with national policy, the Policy and text should be amended to distinguish between the hierarchy of international, national and locally designated sites and afford the appropriate protection, and to provide for a measurable net gain in biodiversity (**MM78**).

Strategic Policy NE7 Pollution Control

214. To be consistent with national policy as expressed in the NPPF, the Policy should be amended to ensure that new development can be integrated effectively with existing businesses and community facilities as per the agent of change principle. The criterion regarding the use of S106 agreements should be altered so that it is consistent with the tests for planning obligations set out in paragraph 57 of the NPPF. To be effective in controlling pollution, the Policy should be amended to require major development proposals to be accompanied by a Construction Environment Management Plan and the text amended to refer to the Canvey Island Six Point Plan and the role of drainage provision in pollution control (**MM79**).

Local Policy NE10 Ensuring Capacity at Water Recycling Centres

215. To make the Policy effective, it and the text should be amended to include a requirement that new development should demonstrate that adequate foul water treatment and drainage already exists or can be provided to serve development, and to require a project level HRA to safeguard Habitats sites as per the recommendations of the HRA (**MM80**).

Strategic Policy HE1 Conserving and Enhancing the Historic Environment

216. The Policy as submitted is inconsistent with national policy for conserving and enhancing the historic environment as set out in the NPPF. The Policy and text should be amended so that they are consistent with national policy and effective through reference to both designated and non-designated heritage assets, and by addressing the significance of heritage assets and their settings. These changes are set out in **MM81**. To be effective, the schedule of listed buildings should also be updated in Appendix 5 to include buildings recently added to the statutory list (**MM85**).

Consequential changes

217. As a consequence of the MMs recommended to the Plan, a number of alterations are necessary to the Monitoring Framework as set out in **MM82**. The Glossary in Appendix 6 should be altered as a consequence of recommended MMs (**MM86**).

Conclusion

218. Subject to the MMs described above, the development management policies in the Plan are effective, justified and consistent with national policy.

Overall Conclusion and Recommendation

219. The Plan has a number of deficiencies in respect of soundness and/or legal compliance for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.

220. The Council has requested that I recommend MMs to make the Plan sound and/or legally compliant and capable of adoption. I conclude

that the duty to cooperate has been met and that with the recommended main modifications set out in the Appendix the New Castle Point Local Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

Philip Lewis

Inspector

This report is accompanied by an Appendix containing the Main Modifications.

Appendix – Main Modifications

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
MM1	2	Paragraph 2.2	Policies in this plan will replace in their entirety the 2007 saved policies from the Castle Point Borough Local Plan adopted in 1998.
MM2	3	Strategic Priorities Bullet Point 3	Promote sustainable development through the effective use of land and ensuring appropriate infrastructure, including flood and transport infrastructure, supports development.
	4	Strategic Priorities Bullet Point 8	Promote active and sustainable modes of travel (including public transport) and reduce travel times by enhancing existing transport infrastructure, ~~and~~ facilities and services.
	4	Strategic Priorities Bullet Point 10	Ensure attractive design that accentuates the positive features in the natural, built and historic environment and results in well—designed beautiful and safe places.
	4	Strategic Priorities Bullet Point 13	Protect and enhance the environment to ensure that there ~~is a~~ are measurable net biodiversity and environmental gains.
	6	Paragraph 3.9	At the heart of the *NPPF* is the presumption in favour of sustainable development. The achievement of sustainable development requires consideration of several themes, including but not limited to economic growth, infrastructure, housing, biodiversity and health. When read as a whole this ~~The~~ Local Plan responds positively to the presumption in favour of sustainable development by positively seeking to meet the development needs of the borough in a way which takes local circumstances into account. The Local Plan addresses these development needs through ~~themes~~ themed ~~in~~ policies throughout the Plan. These themed development policies should be read in conjunction with one another, and in conjunction with those policies that are intended to protect and enhance the environment and achieve sustainable outcomes.
	15	Vision for the Future Paragraph 2	Communities will have been improved through appropriate, high quality development that creates beautiful and safe places and ~~that~~ provides a good mix of homes to support citizens throughout the different stages of their lives.
	15	Vision for the Future Paragraph 6	Important features in the natural and historic environment including wildlife, habitats, landscape features, historic buildings and archaeology will have been protected and ~~where possible~~ enhanced
	16	Objective 1	Objective 1: To protect and enhance the range of services that support healthy and active communities within Castle Point and create beautiful and safe places.
	16	Objective 5	Objective 5: To promote more active and sustainable travel patterns within Castle Point through the location of development, and the provision of ~~public transport and cycling~~ active and sustainable transport infrastructure and services, to complement and provide an attractive alternative to the existing highway network.
	16	Objective 6	Objective 6: To protect and enhance the network of green infrastructure and high quality, accessible green and open space throughout Castle Point.
	16	Objective 7	Objective 7: To protect and enhance the quality of the natural, built and historic environment within Castle Point, having regard to features of ecological, landscape and heritage importance, with the aim of securing measurable environmental and biodiversity net gain and resilient ecological networks.
MM3	17	Chapter 8 Subtitle	Making Effective Use of Land and Creating Sustainable Places
	17	Paragraph 8.5	In considering the location of new residential development the Council has prioritised development within the existing urban areas and previously developed land. Accordingly, together with extant planning permissions and sites development since the 1st April 2018, urban or previously developed sites account for ~~nearly~~ over 50% of the total land supply during the plan period. This includes sites on the brownfield register; sites promoted in the *SHLAA* that are policy compliant but too small to include as allocations in this Plan; and allocated sites within the urban areas. It is assumed that due to Green Belt policy constraints most of the expected windfall will also be within urban areas.
	17	Paragraph 8.7	Canvey island is a high-density settlement based on shallow plots with a tight street pattern. Whilst there are several small sites identified in the *SHLAA* which are policy compliant for development they do not make a significant contribution towards the overall housing need target. It is not therefore possible to secure significant levels of additional growth on Canvey Island through urban intensification. ~~Increasing density within Canvey is not possible.~~ As on the 'mainland'…
	19	Paragraph 8.10	Therefore, the Council has optimised development within the urban areas. Strategic Policy SD1 sets out the general principles against which the Council will ~~favourable~~ consider applications for new development which meet the objectives of this Plan, this includes the requirements of the Habitats Regulations and how place making objectives will be applied.
	19	Paragraph 8.10	*INSERT NEW PARAGRAPH AFTER PARAGRAPH 8.10 AND RENUMBER SUBSEQUENT THEREAFTER ACCORDINGLY* Strategic Policy SD1 sets out the requirement for development proposals to meet the requirements of the Habitats Regulations by avoiding adverse effects on the integrity of Habitats sites through an appropriate approach to development. The Habitats Regulations Assessment (HRA) which accompanies this plan identifies the potential for some of the proposals within the plan to cause adverse effects on the integrity of either the Benfleet and Southend Marshes SPA and Ramsar Site, or the Thames Estuary and Marshes SPA and Ramsar site, either alone or in combination with other plans or projects, unless appropriately mitigated. This is highlighted in the relevant policies. It will be necessary for those proposals which have been identified as having the potential to cause an adverse effect on the integrity to be subject to project level HRA to demonstrate that the necessary mitigation measures have been secured, and the proposal will not impact on the integrity of Habitats sites.
	19	Paragraph 8.10	*INSERT NEW PARAGRAPH AFTER PARAGRAPH 8.10 AND RENUMBER SUBSEQUENT THEREAFTER ACCORDINGLY* To ensure that development positively contributes to the Borough by creating beautiful, healthy and sustainable places and spaces consistent with the NPPF, policy SD1 sets out key place making criteria. To support the Plan an

Ref	Page	Policy/ Paragraph	Main Modification
			Infrastructure Delivery Plan (IDP) has been prepared, this identifies the location, scale, timeframes for delivery and cost of infrastructure required within this Plan. The Council's approach to developer contributions to achieve these place making objectives are set out in strategic policy SD2.
	18	Policy SD1	Making Effective Use of Land and Creating Sustainable Places 1.The Council will seek to make the most effective use of development land in the Borough by: ~~1. Granting permission where detailed proposals come forward for development on sites allocated in this Plan for that purpose and which comply with all other relevant policies in the Plan;~~ a. Approving development proposals that accord with the development plan where it can be demonstrated that there would be no adverse effect on the integrity of the Benfleet and Southend Marshes SPA and Ramsar site or the Thames Estuary and Marshes SPA and Ramsar site, either alone or in combination with other plans and projects. This should be demonstrated through project level HRA for all development proposals where the potential for adverse effects on integrity has been identified in this plan, or because of subsequent information about the condition of Habitats sites. ~~2~~b. Favouring a design-led approach to establishing site density that maximises the use of land and ensures that proposals are of high quality and compatible with the character of the area. ~~3~~c. Favouring a design led approach to development, ensuring that proposals are of high quality and compatible with the prevailing character of the area. ~~4~~d. Recognising ~~this~~ urban intensification and brownfield redevelopment as ~~an~~ important sources of supply, the Council will support proposals for redevelopment and intensification in existing residential areas where appropriate, and development on previously developed land, including land within the Green Belt where those proposals are consistent with the Green Belt policies in this Plan and the provisions of the NPPF. 2. In order to ensure that new development contributes positively towards the quality of the Borough as a place to live and do business, and enable communities and businesses to be sustainable and thrive, the Council will require the following place making objectives to be delivered as part of all proposals in a proportionate way having regard to their scale: a. The delivery of development must be aligned with the provision of necessary infrastructure; b. High standards of design that create places people want to live in and work in now and in the future; c. High standards of sustainability within the design and construction of new buildings so that residents and businesses can enjoy a low cost, healthy living environment; d. The provision of integrated public open space, and the enhancement of the green infrastructure network to offer a range of health and environmental benefits; and e. High levels of accessibility by public transport and active modes of travel to employment, education, services and recreation opportunities in order to promote inclusion and encourage community cohesion.
MM4	19	Paragraph 8.16	The Council will implement a Community Infrastructure Levy (CIL) charging schedule to enable contributions to be made towards infrastructure and services from all new development, including those schemes below the ~~qualifying~~ threshold set out in national Planning Practice Guidance for the use of planning obligations.
	20	Policy SD2	1.The Infrastructure Delivery Plan identifies the infrastructure required to meet the demands of new development. ~~1~~2.Where necessary, ~~T~~ the Council will seek ~~appropriate~~ contributions towards the provision of infrastructure required to make a development proposal acceptable in planning terms, in accordance with the tests set out in the National Planning Policy Framework and the provisions of the Community Infrastructure Levy Regulations and having regard to the provisions of the Infrastructure Delivery Plan. ~~from qualifying developments in order to support the delivery of new or improved infrastructure necessary to deliver the sustainable development promoted in this Plan.~~ ~~2.Permission will only be granted if it can be demonstrated that there is enough infrastructure capacity to support the development or that additional capacity will be delivered by the proposal. It must further be demonstrated that capacity as is required will prove sustainable over time both in physical and financial terms. Where there is insufficient capacity, development will be constrained until such time as capacity is provided to meet demands: this will apply to health and education.~~ 3.~~Where a development proposal requires additional infrastructure capacity, t~~ The mechanism for providing ~~the~~ new infrastructure must be agreed with the Council and where necessary, the appropriate infrastructure provider. Such measures, ~~to~~ will be set out in Section 106 Agreements and may include ~~including~~: o financial contributions towards new or expanded facilities; o on-site construction of new provision; o off-site capacity improvement works; o the provision of land; o financial contributions to the future maintenance and management of new infrastructure; and/or o Local Management Organisations to maintain and manage public open space and public realm within developments. 4. Developers and landowners are expected to work positively with the Council, neighbouring authorities and infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time. ~~5.The Infrastructure Delivery Plan sets out the infrastructure needs of the Borough to meet the demands of new development. Sites allocated and where appropriate other development will be expected to contribute towards the provision of the infrastructure identified in the Infrastructure Delivery Plan.~~
MM5	21	Paragraph 9.5	Since September 2018 the standard methodology has been used as a method to calculate objectively assessed needs. The standard methodology, as set out in national Planning Practice Guidance uses the 2014-based Subnational Household Projections and an adjustment capped at 40% arising from the median house price to workplace-based earnings ratio published by ONS. Due to affordability issues in Castle Point the full 40% applies to the standard methodology calculation, and consequently the need for housing in the Borough derived using the Standard Method sits at 355 homes per year. The *SHMA* Addendum was produced using the same Subnational

Ref	Page	Policy/ Paragraph	Main Modification
			Household Projections but tested different scenarios having been prepared prior to the introduction of the standard methodology. Nonetheless, that evidence also indicates that the need in Castle Point is of the order arising from the standard methodology calculation, and the ~~Prior to that the government published housing targets for all local planning authorities in England in September 2017 in the *Housing Need Consultation Data* Table. Based on the standard methodology the identified target for Castle Point was 342 new homes to be built per annum or 5,130 homes for the Plan period. The~~ Council does not dispute this target and has used it for this plan. Therefore, this Plan will provide a minimum of 5,325 new homes over the Plan period.
	21	Paragraph 9.6	The NPPF expects Local Plans to identify deliverable and developable sites to meet the need of the Borough for at least ten years after the adoption of the plan, and if possible, for the final five years of the plan period. This means that the housing supply identified in this plan needs to ensure that there is sufficient supply to meet needs to 2032 as a minimum. This would require a supply of at least 4,970 homes for the period 2018 to 2032. This Plan identifies land for ~~5,284~~ 5,510 new homes, providing enough supply for the plan period to 2033, with a small margin for headroom. In the meantime, the Council will continue to work with partners across South Essex through the preparation of the Joint Strategic Plan to identify a strategic approach to growth across the entire area over the longer term. This will enable the review of this Local Plan to establish how housing needs will be met in full to 2037. ~~This exceeds the OAN by 154 homes and equates to 352 new homes per annum. This exceeds the target of 342 homes per annum. Therefore, there is no unmet need which other local planning authority areas need to include within their emerging local plans.~~
	21	Paragraph 9.7	This plan sets out how the supply of ~~5,284~~ 5,510 will be met during the plan period. The priority has been to accommodate as much of this supply within existing urban areas. However, as set out in the Housing Sites Topic Paper 2018, developable urban land is a finite resource, and not all the forecast growth can be met within the existing urban areas.
	22	Paragraph 9.9	Subsequent work from the 2018 Housing Sites Options Topic Paper means that housing needs can be met in full. This includes the ~~However, that report which was used to support a November 2018 version of this plan, did not take into consideration~~ inclusion of existing planning consents or completions since April 2018 and ~~, both of which boost the overall supply of new homes. Furthermore, there were~~ several urban sites which were discounted from the Strategic Housing Land Availability Assessment (SHLAA) policy compliant schedule, as the landowner did not respond to the 2018 Call for sites~~, despite having responded to earlier 'Call for Sites'~~. These are small sites, which provide a total of 166 dwellings and if they come forward are likely to secure planning consent. These have been added to the housing supply towards the end of the plan period. Therefore, the work completed since 2018 highlights that the OAN can now be met in full.
	22	Paragraph 9.9	*INSERT THE FOLLOWING PARAGRAPH AFTER PARAGRAPH 9.9 AND AMEND THE NUMBERING ON ALL SUBSEQUENT PARAGRAPHS THEREAFTER* Whilst the SHLAA identifies specific sites for the purposes of development, it is known that sites have come forward unexpectedly over time for the purpose of redevelopment, increasing housing provision. Typically, this has secured upwards of 20 homes per annum in Castle Point, normally on smaller sites where the intensity of built development can be optimised. It is also common for windfall sites to arise through changes in economic cycles. As an example, the retail sector is currently experiencing significant changes in the way people shop impacting on the amount of built floorspace required in town centres. It is therefore anticipated that these economic changes with drive windfall provision up to around 60 homes per annum.
	22	Paragraph 9.10	Therefore, the borough has capacity to accommodate in the region of ~~5,284~~ 5,510 homes. The Council has prioritised capacity within urban areas and / or on brownfield sites from a variety of sources as set out in the table below. This capacity is drawn from the following: • Housing completions from 1 April 2018 until 31 March ~~2019~~ 2021; • Current extant planning permissions and prior approvals for net new dwellings; • Policy compliant sites, which are small sites within the urban area that are featured in the *SHLAA*; • The *Brownfield Land Register (BLR)* which is a document agreed by the Council which has a number of brownfield sites that are suitable and available for development in the Borough; • ~~Small~~ Windfall sites; and • Strategic housing allocations, those within urban areas and those outside urban areas.
	22	Paragraph 9.11	The total housing supply for the plan period is set out in Policy HO1. Of the total ~~5,284~~ 5,510 new homes, approximately half are strategic allocations in non-urban areas:
	23	Paragraph 9.17	*INSERT THE FOLLOWING TWO PARAGRAPHS AFTER PARAGRAPH 9.17 AND AMEND THE NUMBERING ON ALL SUBSEQUENT PARAGRAPHS THEREAFTER* Due to the significant level of provision expected to be delivered on former Green Belt sites, there is an impact on the delivery of new homes and the housing trajectory over the plan period. This is because in the period prior to the adoption of the plan Green Belt sites are not available for development and it will take some time for them to come forward after the adoption of the plan. The Council is however putting in place mechanisms to enable permissions on Strategic Allocation Sites come forward promptly after the adoption of this plan. Nevertheless, the report *Start to Finish Second Edition February 2020* indicates that it can take time for the first completions to be secured on larger sites. To this end, once the plan is adopted there will be stepped increase in housing supply within Castle Point, although ultimately, the level of housing required will be secured over the plan period. To this end the housing requirement set out in Policy HO1 is stepped, at a minimum of 291 new homes per annum for the years 2018/19 to 2025/26, and at least 430 homes per annum from 2026/27 and for the rest of the plan period.
	23	Table 9.1	*REPLACE TABLE 9.1 IN ITS ENTIRETY WITH THE TABLE BELOW* ~~Ref	Site	Completions	Extant Permission	2018-2023	2023-2028	2028-2033	TOTAL~~ ~~HO9	Land west of Benfleet	0	0	100	460	290	850~~

Ref	Page	Policy/ Paragraph	Main Modification

~~HO10~~	~~Land between Felstead Road and Catherine Road~~	~~0~~	~~22~~	~~0~~	~~101~~	~~0~~	~~101~~
~~HO11~~	~~Land off Glyders~~	~~0~~	~~0~~	~~5~~	~~25~~	~~0~~	~~30~~
~~HO12~~	~~Site of the former WRVS Hall, Richmond Avenue~~	~~0~~	~~0~~	~~20~~	~~19~~	~~0~~	~~39~~
~~HO13~~	~~Land east of Rayleigh Road~~	~~0~~	~~0~~	~~-100~~	~~290~~	~~-65~~	~~455~~
~~HO14~~	~~Land at Brook Farm~~	~~0~~	~~0~~	~~0~~	~~173~~	~~0~~	~~173~~
~~HO15~~	~~Land south of Scrub Lane~~	~~0~~	~~0~~	~~0~~	~~55~~	~~0~~	~~55~~
~~HO16~~	~~Land at Oak Tree Farm~~	~~0~~	~~0~~	~~0~~	~~65~~	~~0~~	~~65~~
~~HO17~~	~~Hadleigh Island~~	~~0~~	~~0~~	~~0~~	~~52~~	~~0~~	~~52~~
~~HO18~~	~~Land north of Grasmere Road and Borrowdale Road~~	~~0~~	~~0~~	~~30~~	~~0~~	~~0~~	~~30~~
~~HO19~~	~~Land at Glebelands~~	~~0~~	~~0~~	~~10~~	~~145~~	~~0~~	~~155~~
~~HO20~~	~~The Chase~~	~~0~~	~~10~~	~~0~~	~~320~~	~~20~~	~~340~~
~~HO21~~	~~Land fronting Rayleigh Road~~	~~0~~	~~0~~	~~0~~	~~0~~	~~60~~	~~60~~
~~HO22~~	~~Land at Thames Loose Leaf~~	~~0~~	~~0~~	~~0~~	~~0~~	~~12~~	~~12~~
~~HO23~~	~~Land east of Canvey Road~~	~~0~~	~~0~~	~~0~~	~~262~~	~~38~~	~~300~~
~~HO24~~	~~Land west of Canvey Road~~	~~0~~	~~57~~	~~0~~	~~-19~~	~~177~~	~~196~~
~~HO25~~	~~Land at Thorney Bay Caravan Park~~	~~-90~~	~~0~~	~~-0~~	~~-210~~	~~-300~~	~~-510~~
~~HO26~~	~~Land at The Point~~	~~0~~	~~0~~	~~0~~	~~0~~	~~100~~	~~100~~
~~HO27~~	~~Walsingham House~~	~~0~~	~~0~~	~~16~~	~~16~~	~~0~~	~~32~~
~~HO28~~	~~Land at Admiral Jellicoe~~	~~0~~	~~0~~	~~-40~~	~~-0~~	~~0~~	~~40~~
~~HO29~~	~~Land south of Haron Close~~	~~0~~	~~0~~	~~-10~~	~~-0~~	~~0~~	~~10~~
~~HO30~~	~~Land at Haystack car park~~	~~0~~	~~0~~	~~14~~	~~0~~	~~0~~	~~14~~
~~HO31~~	~~Land at Kings Park~~	~~0~~	~~0~~	~~-25~~	~~-25~~	~~0~~	~~50~~
~~HO32~~	~~244-258 London Road~~	~~0~~	~~0~~	~~0~~	~~0~~	~~50~~	~~50~~
~~*Total from strategic allocations*~~		~~*90*~~	~~*89*~~	~~*-370*~~	~~*-2,237*~~	~~*-1,112*~~	~~*3,719*~~
~~Completions~~				~~-200~~	~~0~~	~~0~~	~~-200~~
~~Extant planning permissions~~				~~-605~~	~~0~~	~~0~~	~~-605~~
~~Policy compliant sites~~				~~-29~~	~~78~~	~~186~~	~~-293~~
~~Brownfield Land Register~~				~~-125~~	~~-63~~	~~-15~~	~~-203~~
~~Windfall~~				~~-80~~	~~-110~~	~~-110~~	~~-300~~
~~Gross total~~				~~-1,409~~	~~-2,488~~	~~-1,423~~	~~-5,320~~
			~~Replacement dwellings on strategic allocations~~			~~-36~~	
			~~Net Total~~			~~5,284~~	

Ref	Site	Capacity	Losses	Extant Permission (as of 31.03.21)	2018/19-2020/21	2021/22-2025/26	2026/27-2030/31	2031/32-2032/33
HO9	Land west of Benfleet	850	-	-	0	150	500	200
HO9	Land west of Benfleet Care Home (60 bed)	33	-	-	0	0	33	0
HO10	Land between Felstead Road and Catherine Road	125	-12	24	0	65	60	0
HO11	Land off Glyders	30	-	-	0	30	0	0
HO12	Site of the former WRVS Hall, Richmond Avenue	39	-	-	0	15	24	0
HO13	Land east of Rayleigh Road	455	-	-	0	165	275	15
HO14	Land at Brook Farm	173	-	-	0	165	8	0
HO15	Land south of Scrub Lane	55	-	-	0	55	0	0

Ref	Page	Policy/ Paragraph	Main Modification

HO16	Land at Oak Tree Farm	65	-	-	0	65	0	0
HO17	Hadleigh Island	52	-	-	0	38	14	0
HO18	Land north of Grasmere Road and Borrowdale Road	30	-	-	0	0	0	30
HO19	Land at Glebelands	155	-	-	0	155	0	0
HO20	The Chase	430	-13	18	0	183	247	0
HO20	The Chase Care Home (60 bed)	33	-	-	0	33	0	0
HO21	Land fronting Rayleigh Road	60	-1	-	0	0	0	60
HO22	Land at Thames Loose Leaf	12	-	-	0	12	0	0
HO23	Land east of Canvey Road	300	-	-	0	150	150	0
HO24	Land west of Canvey Road	199	-3	-	0	0	150	49
HO24	Land west of Canvey Road Care Home (57 bed)	32	-	32	0	32	0	0
HO25	Land at Thorney Bay Caravan Park	820	-590	-	195	375	250	0
HO26	Land at The Point	100	-2	-	0	0	50	50
HO27	Walsingham House	32	-	32	0	32	0	0
HO28	Land at Admiral Jellicoe	14	-	-	0	14	0	0
HO29	Land south of Haron Close	24	-	24	0	24	0	0
HO30	Land at Haystack car park	14	-	14	0	14	0	0
HO31	Land at Kings Park	50	-	-	0	0	50	0
HO32	244-258 London Road	50	-5	-	0	0	0	50
Total from strategic allocations		*4232*	*-626*	*144*	*195*	*1772*	*1811*	*454*
Other Completions 2018 – 2021 (Net)		434	-88	-	434	0	0	0
Extant planning permissions at 1 April 2021 (Net)		502	-	-	0	475	27	0
Policy compliant sites		272	-	-	0	20	138	114
Brownfield Land Register		179	-	-	0	44	85	50
Windfall		600	-	-	0	180	300	120
Total from other sites		*1987*	*-88*	-	*434*	*719*	*550*	*284*
Total Supply		6219						
Losses		-709						
Total (Net)		5510						

24 — Policy HO1

1. In order to deliver sufficient homes to meet housing need ~~at least 5,284 homes~~ within Castle Point Borough during the period 2018 to 2033 the Council will ~~This will be achieved by~~:

a. Identify a specific supply of at least 5,325 homes for the period to 2033, comprising the following:

Source	Total	Percentage of net total
Completions (2018/~~19~~2021)	~~200~~ 434	~~3.75~~ 6.9%
Extant permissions (31.3.~~2019~~2021)	~~605~~ 502	~~11.~~37 8%
Brownfield Register	~~203~~ 179	~~3.81~~ 2.8%
Policy Compliant SHLAA	~~293~~ 272	~~5.5~~ 4.3%
Windfall	~~300~~ 600	~~5.63~~ 9.6%
Strategic Allocations on Urban or Brownfield sites	~~974~~ 1,272	~~18.3~~ 20.4%
Total completions, consented, urban or brownfield	*~~2,575~~ 3,259*	*~~48.4~~ 52%*
Strategic allocations outside urban areas	~~2,745~~ 2,960	~~51.6~~ 48%
Gross total	*~~5,320~~ 6,219*	*100%*
Potential demolitions	~~-36~~ -709	
Net Total Supply	~~5,284~~ 5,510	

b. Prepare a Joint Strategic Plan in conjunction with partner authorities in South Essex to determine how longer-term housing needs will be secured across the area and review this plan to reflect the outcomes of the Joint Strategic Plan.

Ref	Page	Policy/ Paragraph	Main Modification
			2. The housing requirement for the plan period as a whole is a minimum of 5,325 homes. For the years 2018/19 to 2025/26 an annualised housing requirement of at least 291 homes per annum applies. For the years 2026/27 and for the remainder of the plan period, the annualised housing requirement is at least 430 homes per annum. ~~2.To deliver homes to meet need, the Council will:~~ ~~a. Make the most effective use of land within existing residential areas for the provision of new homes;~~ ~~b. Support development in town centres to incorporate residential development on upper floors, and in locations on the edge of town centres;~~ ~~c. Support development on the Housing Strategic Allocations sites;~~ ~~d. Ensure that the mix of new homes provided in the Borough is aligned with the local needs. This will enable first time buyers, growing families and those looking to downsize to meet their accommodation needs;~~ ~~e. Secure specific provision of specialist accommodation for older people, and other vulnerable adults living in our communities;~~ ~~f. Publicise and maintain its self-build and custom build housing register, and provide opportunities for local people to build their own homes through the identification of sites identified either specifically for self-build development, or as part of a larger development site; and~~ ~~g. Put in place appropriate policies which seek to meet the special accommodation needs of our Gypsy, Traveller and Travelling Showpeople population.~~ ~~3. For local people whose housing needs are not met by the market, the Council will seek to ensure that provision is made for affordable homes inclusive of the total housing target for the Borough. This will be achieved by:~~ ~~a. Seeking a proportion of new homes provided by developers to be affordable;~~ ~~b. Delivering affordable homes via the Council's own house building programmes; and~~ ~~c. Appropriate policies to meet the accommodation needs of Gypsies and Travellers.~~ ~~4. In order to ensure new homes contribute positively towards the quality of the Borough as a place to live, and enable communities to be sustainable and thrive, the Council will require the following:~~ ~~a. The delivery of homes must be phased to align with infrastructure provision;~~ ~~b. High standards of design that create places people want to live now and in the future;~~ ~~c. High standards of sustainability within the design and construction of new homes so that residents can enjoy a low cost, healthy living environment;~~ ~~d. The provision of integrated public open space, and the enhancement of the green infrastructure network to offer a range of health and environmental benefits; and~~ ~~e. High levels of accessibility by public transport and active modes of travel to employment, education, services and recreation opportunities in order to promote inclusion and encourage community cohesion.~~
MM6	26	Policy HO2	1. The Council expects master plans ~~and/~~or planning or development briefs for all ~~major~~ allocations for housing development within this plan, to be prepared having regard to local design guidance set out in the Essex Design Guide, and where relevant the National Design Guide and National Model Design Code ~~proposals~~. 2. The Council will expect entering into voluntary planning performance agreements (PPA) with promoters of such development, to cover matters such as master planning, the pre-application process and a timetable for key events and the nature of engagement with the Council and the community. 3. In order to demonstrate its commitment to the master plan process, the Council will in appropriate cases, adopt master plans/planning development briefs as supplementary planning documents and will then accord significant weight to them in the determination of any subsequent planning applications. The Council will consider the complexity of landownership, the infrastructure requirements of the site, and the scale of development when determining whether to adopt a masterplan/development brief as an SPD.
MM7	27	Paragraphs 9.26 to 9.32 and Table 9.2	*RENUMBER PARAGRAPH NUMBERS AS APPROPRIATE* 9.26 The *Addendum to the South Essex Strategic Housing Market Assessment (SHMA) for Castle Point (2020)* ~~(2016) identified~~ reviewed the need for different house sizes and types to meet the changing needs of the Borough's population. This *Addendum* concluded that there will be demand from a range of different household types, although demand will be particularly strong from families with children and people of retirement age. ~~There is a demand of 32% of total supply for smaller units (1 or 2 bedroom housing), reflecting the demographic trends of the Borough led by younger people looking to set up their first home.~~ This means that ~~T~~there is ~~also~~ a strong demand, for 3 or 4-bedroom properties reflecting the need of growing families. It is important that these homes are provided as they will help to attract more professional and working aged people to live in the area. This is particularly important for both business growth and in sustaining public services, such as healthcare. 9.27 The ~~SHMA~~ *Addendum* ~~also identifies~~ in identifying a housing pressure arising from the growing population of older people, highlights the desirability of bungalows in Castle Point. Bungalows make up 29% of the housing stock currently, and it is expected that there will be demand for additional bungalows in the plan period, reflecting the characteristics of the local housing stock. It also identifies the need for specialist accommodation for older people, suggesting a need for around 45 units per annum of sheltered housing types. In addition to this around 20 additional bedspaces are required each year in residential care/nursing accommodation. Despite the need for specialist accommodation, it is expected that the majority of older people will however live in bungalows or houses within the community, and these will therefore require adaptations to remain fit for purpose. Where homes have been built to higher accessibility standards as outlined in Part M of the Building Regulations, these adaptations can be easier to deliver and ensure people can remain in their homes for longer. Properties designed to such standards may also be suitable for other people who require support such as children and working aged adults with disabilities. ~~This has~~

<table>
<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td></td><td></td><td></td><td>~~implication for the turnover of existing homes and for the demand for homes suitable for older people who may need to live in supported housing~~

9.28 The ~~SHMA 2016 and the SHMA Addendum 2017 examined the current dwelling characteristics for all authorities across South Essex~~ *Addendum* identifies the potential demand for different housing types and sizes, as set out in table 9.2 below. It is anticipated that by securing this mix of development across the borough, the future needs of the borough will be met, although it is noted that this demand may shift over time based on changes in the local market.

9.29 Given the mix of house types and sizes required, the Council will be seeking a mix of different housing types and sizes on appropriate sites in order to ensure that development proposals are contributing to ~~The Council will consider accommodation requirements for specific groups as part of creating~~ sustainable, mixed, socially inclusive communities. ~~In relation to the size of properties, the SHMA identifies the proportional split by type and number of bedrooms for additional households.~~ The Council will therefore expect developers to have regard to table 9.2 in making provision for a housing mix on an individual development site. To remain flexible and reflect changes in local market factors, the most recent SHMA outputs will guide the appropriate mix in future.

Table 9.2 Housing Mix requirements in the SHMA

<table>
<tr><th colspan="4">Type of Accommodation Required</th></tr>
<tr><td colspan="2">~~Detached Semi Detached~~ Houses</td><td>~~Terraced~~ Bungalows</td><td>Flats</td></tr>
<tr><td colspan="2">~~43.6% 41.7%~~ 68%</td><td>~~5.5%~~ 25%</td><td>~~9.2%~~ 7%</td></tr>
<tr><th colspan="4">Size of Accommodation Required</th></tr>
<tr><td>1-bed</td><td>2-bed</td><td>3-bed</td><td>4 or more bed</td></tr>
<tr><td>~~7%~~ 6%</td><td>~~25%~~ 22%</td><td>~~42%~~ 43%</td><td>~~27%~~ 29%</td></tr>
</table>

9.30 The evidence base indicates that there is a clear need for a diverse mix of house sizes and types in Castle Point in order to respond to demographic trends in the borough ~~for first time buyers and an~~ including an increasing number of older people. By securing an appropriate mix of homes on development sites, these ~~difficulties can be addressed~~ needs can be met.

9.31 In addition, the housing mix should also reflect the local context of the site, as it is recognised that ~~I~~ it will not be possible to secure a full mix of house sizes and types on all sites. Very small sites will be constrained by site capacity and the existing street scene. However, larger sites will be able to make an increasingly more significant contribution to the mix within the local housing market. In taking the local context into account it is recognised that some sites may provide mainly flatted developments, whilst others will potentially provide more houses and bungalows. Consideration will be made on an individual site basis.

9.32 Some sites in highly sustainable locations such as near railway stations and town centres should secure a significant uplift in density, consistent with the requirements of the NPPF. This may see more flatted developments, and alternative house types such as town houses and maisonettes provided in these locations. The *Essex Design Guide* considers densities for sustainable development, areas that are located within sustainable locations such as these and should be referred to when seeking to prepare proposals which ~~are encouraged to~~ produce a higher density. The *Castle Point Large Site Capacity Assessment 2018* assesses various sites within Castle Point and evaluates the optimum density based on constraints and the surrounding environment. This provides an indication of the house types that may be appropriate on the strategic allocations set out in this plan. For other sites, a context appraisal will be required.

ADD NEW PARAGRAPH AND NUMBER ACCORDINGLY

Within this plan are two allocations which are expected to come forward for the provision of park homes, aimed at retirees. These will make a substantial contribution to addressing the needs of this age group but may not be a form of development which is desirable or appropriate for all, especially those requiring additional support. To this end, there will remain a need for accommodation for older people to be met on sites across the borough, through more traditional or formalised forms of accommodation.</td></tr>
<tr><td></td><td>28</td><td>Policy HO3</td><td>*REPLACE POLICY HO3 WITH THE FOLLOWING POLICY TEXT:*

~~In order to achieve a local housing supply that responds to local housing need, the following sizes and types of homes should be included:~~
~~Sites of between 0.5 and 4ha should comprise at least 35% 1 or 2-bedroom homes for general needs; and~~
~~Sites over 4ha should comprise at least 25% 1 or 2-bedroom homes for general needs.~~
~~The requirements of this policy will be weighed against regeneration objectives where the proposal under consideration is for a mixed-use development comprising an element of housing and is within the following areas identified on the Policies Map:~~
~~A town centre location; or~~
~~Canvey Seafront Entertainment Area.~~

In order to achieve a local housing supply that responds to local housing need, the Council will require a mix of different sized and type homes to be secured within developments, contributing to the creation of sustainable communities. In determining if a sufficient and appropriate mix has been achieved, the Council will have regard to the most recent SHMA outputs (currently set out in Table 9.2), and the location and context of the site.

Where a site is 1ha in size or larger, the Council will expect developers to have considered how homes specifically aimed at older people can be accommodated within the site, and where appropriate made provision for such homes as part of the overall housing mix. Such homes could take the form of bungalows, specialist accommodation, or houses which meet Part M4(2) of the Building Regulations. In determining an appropriate form for older people's accommodation regard should be had to the requirements of policy CC2 on Canvey Island.</td></tr>
<tr><td>MM8</td><td>28</td><td>Paragraph 9.35</td><td>The *Whole Plan Viability Assessment* identifies a viable level of affordable housing taking into account other infrastructure requirements and development costs. In the case of Canvey Island, the additional groundwork costs indicate that the provision of affordable housing at the same level as the mainland, will affect commercial viability of development. Therefore, separate rates are proposed for Canvey Island of between 15% and 40% and for South Benfleet, Hadleigh and Thundersley of 40%. Whilst the requirement for affordable housing can be applied to specialist accommodation for older people in the South Benfleet, Hadleigh and Thundersley area without affecting viability, the additional costs associated with building such schemes on Canvey Island is likely to render such</td></tr>
</table>

Ref	Page	Policy/ Paragraph	Main Modification
			development unviable. Therefore, specialist accommodation for older people on Canvey Island cannot provide affordable housing without affecting overall delivery.
	29	Paragraph 9.39	The Council will therefore seek the affordable housing element of development proposals to provide at least 50% ~~social or affordable rented accommodation~~ affordable housing for rent, as defined in the *NPPF*, available to those in need of social housing, ~~and~~ with the remainder ~~no more than 50%~~ provided in the form of affordable homes to buy, as defined in the *NPPF*, ~~intermediate housing~~ aimed at helping local first-time buyers access the housing market. Any national requirements aimed at improving access to affordable homes to buy, such as First Homes, should be met from that element of the affordable housing supply, and does not affect the requirement for 50% of affordable homes to be affordable housing to rent. Affordable housing definitions may change over the life of this Plan, and proposals should have regard to the latest definitions as set out in national policy.
	29	Paragraph 9.41	Payment in lieu of on-site provision will only be accepted in exceptional circumstances. In such circumstances, the payment will be equivalent to the cost of on-site provision ~~proposals as well as large housing proposals. However, in accordance with the *NPPF* affordable housing will only be sought for proposals of 10 units or more~~. Details on how off-site provision should be provided will be set out in a Developers Contributions Guidance ~~n Affordable Housing~~ Supplementary Planning Document.
	30	Policy HO4	1. All proposals for housing development, and mixed-use proposals that include an element of housing, resulting in ~~11~~ 10 or more net additional homes will be required to make ~~the following level of~~ provision for 40% affordable housing ~~of affordable housing~~, with the following exceptions: ~~a. Up to 40% for development sites on the mainland (Benfleet, Hadleigh and Thundersley)~~ ~~b. On Canvey Island:~~ a. 0% affordable housing is required for standalone developments comprising solely specialist accommodation for older people on Canvey Island; b~~i~~. 15% affordable housing is required for ~~all~~ developments of less than 100 dwellings which ~~includes~~ comprise solely flats on Canvey Island; and c~~ii~~. 25% affordable housing is required for ~~all~~ other developments of less than 100 dwellings on Canvey Island ~~which does not include flats; and~~. ~~iii. Up to 40% for all developments of 100 dwellings or more.~~ 2. Affordable housing provision will normally be provided on-site. The Council will also consider proposals for off-site provision where the provision of affordable housing is equivalent to the level of requirement set out under part 1 of this policy. Payments in lieu of on-site provision will only be permitted in exceptional circumstances. Such payments should be equivalent to the cost of on-site provision. 3. The targets set out in Part 1~~a~~ above represent the target for all development of ~~11~~ 10 or more units. In exceptional circumstances where there is evidence that a development is unviable at those levels, ~~including below 40%,~~ it will be the responsibility of the applicant ~~development~~ to make the case to the satisfaction of the Council. 4. The Council will seek no less than 50% of all new affordable housing ~~as affordable or social rented~~ to be affordable housing for rent, with the remainder ~~and 50%~~ as ~~intermediate housing~~ affordable home ownership products, as defined in the NPPF. The Council will seek nomination rights in the Section 106 Agreement.
MM9	32	Paragraph 9.54	Thorney Bay provides rented accommodation within previous holiday type caravans, as well as owner-occupied accommodation in modern 'park homes'. There are some health and well-being issues associated with the residential use of holiday-type caravans, particularly during winter months. ~~There are proposals to redevelop most of this park for traditional homes, however around 300 caravans may continue to be provided towards the western extent of the site under existing planning permissions.~~
	32	Policy HO6	1.Proposals for new caravan parks, and for extensions to existing caravan parks in Castle Point will only be supported where robust evidence can be provided that demonstrates a significant need for such additional provision in Castle Point, and that the proposed site is suitable for the accommodation of caravans in terms of access, layout, amenities, flood risk and impact on the surrounding area. Where appropriate a project level HRA may be required alongside consideration of the proposal, as per the requirements set out in policy SD1 2. In the instance where the above requirements can be met, consideration will be given as to whether a condition should be used to restrict the winter use of caravans. Winter use will be restricted where: a. The site has been exceptionally permitted following the application of the sequential and exception tests but is not suitable for permanent residential use due to its location in flood risk zone 3; or b. The quality of the proposed caravans to be located on the site is not suitable for year-round occupation without risk to the health and well-being of potential occupiers.
MM10	34	Paragraphs 9.64 – 9.66	*DELETE PARAGRAPHS 9.64 AND 9.66 AND INSERT THE NEW PARAGRAPHS BELOW. RENUMBER SUBSEQUENT PARAGRAPHS ACCORDINGLY* ~~There is no need for additional pitches in Castle Point from the CPLNAA period to 2034 for Gypsy and Traveller households that meet the planning definition as none were identified; a need for up to one additional pitch for Gypsy and Traveller households that may meet the planning definition; and a need for five additional pitches for Gypsy and Traveller households who do not meet the planning definition.~~ There are currently two existing Gypsy and Traveller sites within the borough these are called Janda Fields and Orchard Place. Since the publication of the Greater Essex Gypsy, Traveller and Travelling Showpeople Accommodation Assessment in 2018 an application for additional static caravans on the existing private Janda Fields site was allowed on appeal (PINS Ref: 3213684). At the Appeal Hearing the residents of the site confirmed that the additional static caravans would be sufficient to meet all of their current and future needs. There was no need identified in the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment for households that met the PPTS planning definition of a Traveller, other than that which has now been addressed through the additional static caravans at the site at Janda Fields. The remaining need in the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment arises from households where it was not possible to complete an interview (undetermined households), and from households that did not meet the PPTS planning definition of a Traveller.

Ref	Page	Policy/ Paragraph	Main Modification
			In order to meet the needs of Gypsies and Travellers in the borough and due to the size of Orchard Place, there is scope to provide further pitches. As a result, this site is allocated for Gypsy and Traveller accommodation needs only. This site, as identified on the Policies Map, is inset from the Green Belt and allocated for Gypsy and Traveller accommodation only. Applications for Gypsy and Traveller accommodation outside of this site and within the Green Belt would be inappropriate development and relevant Green Belt policies within this Plan would apply. There were no Travelling Showpeople identified living in Castle Point so there is no current or future need for additional plots. ~~The needs of those households that may meet the planning definition and households that do not meet the planning definition results in requirement for a total of six dwellings over the plan period. Due to the acute housing constraints in the borough, and the relatively limited scale of need identified by independent objective research, no specific sites have been identified to meet the needs of these households, instead a local criteria-based policy will be applied.~~
	34	Policy HO7	1. Orchard Place as identified on the Policies Map, is allocated for Gypsy and Traveller accommodation only. 2. Applications ~~Sites~~ for Gypsy and Traveller accommodation outside of the Gypsy and Traveller Site identified on the Policies Map will be permitted in Castle Point where proposals meet the following criteria: a. A project level HRA, where appropriate, may be required alongside the consideration of the proposal, as per the requirements set out in policy SD1; ~~a~~b. The proposed site location has good access to healthcare, schools and other community facilities; ~~b~~c. The location of the proposed site is safe, achieves adequate living conditions and does not pose a risk to potential occupants from natural or man-made hazards, including but not limited to: i. Flood risk; ii. Proximity to hazardous installations or operations; iii. Air quality; iv. Excessive noise; and v. Highway safety. ~~c~~d. The privacy and amenity of neighbouring properties would not be adversely affected; and ~~d~~e. The proposed design and layout of the site should be sensitive to the local environment, setting and landscape in which the site is located. ~~2. A proposal for Gypsy and Traveller accommodation within the Green Belt will only be permitted where It can be demonstrated that very special circumstances justify an exception to Green Belt policy.~~ 3. In order to protect the limited supply of lawful Gypsy and Traveller sites in the borough, proposals that would lead to the loss of sites will only be permitted where it is demonstrated that there is no longer an identified need for the site, or that replacement provision on a site that is equal or of better quality is provided subject to the policies in this plan.
MM11	35	Paragraphs 9.68 – 9.70	*DELETE PARAGRAPHS 9.68 – 9.70 AND REPLACE WITH THE BELOW TEXT* ~~9.68 Residential annexes are a common form of development that are generally proposed in order to allow relatives to live with their family with a degree of independence. This type of development can be very beneficial and provides suitable accommodation which allows vulnerable or less able people within the community the opportunity to live independently in close proximity to family members.~~ ~~9.69 In many cases, such proposals may be considered acceptable, however, caution needs to be exercised to ensure that this does not result in proposals which effectively create new independent dwellings to the rear of existing homes as in many cases this can result in the provision of accommodation of a poor design, inappropriately located and lacking adequate facilities and amenities.~~ ~~9.70 The addition of annexes to residential properties can also have a considerable impact upon the character and amenity of an area through the intensification of development. Through this policy the Council will seek to ensure that any residential annexe development is solely provided as ancillary accommodation to the original dwelling and not as a new dwelling.~~ Limited housing supply, increasing house prices and an increase in the number of people in the community with care needs, can result in extended families, including adult children, in some cases with children of their own, and elderly parents all occupying a single residential property. Annexes for family members, particularly elderly relatives, can help to meet social needs whilst reducing pressure on other types of accommodation. However, such accommodation can have other implications such as on-site car parking provision, amenity space and local amenity. Annexes may be created through the extension of host dwellings, the conversion of attached and detached outbuildings and the provisions of new structures within the curtilage of the host dwelling. In order to most effectively maintain a long term ancillary link and to consolidate the built form, where possible, the Planning Authority will encourage the provision of annexes through the extension of the host dwellinghouse. Where annexes are no longer required for their original purpose, some homeowners may seek to dispose of the Annexe as self-contained and independent accommodation. Such disposal can result in the creation of dwellings out of character with their surrounding pattern of spatial development which lack appropriate setting and amenities and place pressure on parking and infrastructure provision. Where it appears likely that an annexe has the potential to be used in the future as self-contained and independent accommodation, and this would be inappropriate spatially or have a detrimental impact on character, amenity or infrastructure, where consistent with the statutory tests for planning obligations, applicants will be required to enter into a S106 Agreement to ensure that the permitted Annexe is retained as such.
	36	Policy HO8	*DELETE WORDING OF POLICY HO8 AND REPLACE WITH THE BELOW TEXT* ~~1. Planning permission for the creation of a residential annexe will only be granted if all the following criteria are met:~~

Ref	Page	Policy/ Paragraph	Main Modification
			~~a. the annexe shall be within the same ownership as, and will be occupied in conjunction with, the original dwelling;~~ ~~b. the annexe does not appear tantamount to the creation of a new dwelling or separate planning unit;~~ ~~c. the annexe is ancillary and subordinate in size and scale to the original dwelling, and of a design which, taken as a whole, complements the original dwelling;~~ ~~d. the occupant(s) of the annexe share(s) the access, garden and parking areas of the original dwelling;~~ ~~e. there is a clear functional relationship between the occupant(s) of the annexe and the original dwelling;~~ ~~f. the provision of services and utilities to the annexe are provided via the original dwelling; and~~ ~~g. the proposal does not cause any other harm, such as, but not limited to, amenity (including on occupiers of the annexe, the original dwelling and neighbours), heritage and biodiversity assets, highways, parking, flood risk or character of the locality.~~ ~~2. Development of detached residential annexes within the defined property boundary will only be permitted where it is demonstrated that the accommodation cannot reasonably be provided as an extension to the original dwelling. Development of residential annexes within the Green Belt will only be permitted where they are an extension to the existing dwelling or the conversion of an existing outbuilding where there is a close physical relationship with the main dwelling. Any proposal for the creation of a new detached building for use as an annexe in the Green Belt will be treated as a new dwelling, and proposals considered as such.~~ 1. In the determination of any application for the provision of a residential annexe within the curtilage of an existing dwellinghouse, either through extension, conversion or new build, the Local Planning Authority will give weight to the following considerations: (a) Ancilliarity: The proposed Annexe shall be ancillary to the host dwellinghouse. The applicant will be required to demonstrate a clear functional connection with, and degree of dependency on, the host dwellinghouse. (b) Size: The proposed Annexe shall be subordinate in size and scale to the host dwellinghouse and shall demonstrate a level and scale of accommodation that can be justified for its intended users. (c) Design and Layout: The design of the Annexe shall be sympathetic to the locality and the Annexe shall not be sited in a manner likely to result in an unacceptable loss of parking or amenity space for the residents of the host dwellinghouse, or the privacy and amenity of adjoining residents. There shall be no demarcation or subdivision of the garden areas between the Annexe and the host dwellinghouse and access to the Annexe shall be shared with the host dwelling. 2. Proposals for the provision of Annexes to dwelling houses in the Green Belt will also be considered within the context of Policies GB1, GB2 and GB3 of this Local Plan. 3. Where consistent with the statutory tests for planning obligations, applicants will be required to enter into a S106 Agreement to secure the retention of the Annexe for purposes ancillary to the host dwelling
MM12	37	Paragraph 10.1	The sites identified in this Plan aim to achieve the total supply of ~~5,284~~ 5,510 new homes by 2033.
	37	Paragraph 10.3	*INSERT NEW PARAGRAPH AFTER 10.3 AND RENUMBER SUBSEQUENT PARAGRAPHS* ACCORDINGLY The site capacities for the allocations within this chapter are a consequence of site capacity evidence work through the Large Site Capacity Assessments or the Strategic Housing Land Availability Assessment (SHLAA). For the purposes of plan making an indicative number of dwellings expected to be delivered on each site is stated, taking into account individual site constraints and infrastructure requirements. The specific number of dwellings expected on each site will however be determined through the development management process, having regard to site constraints, opportunities and housing mix.
MM13	38	Paragraph 10.13	It is considered that given the diverse nature of the site, it should be developed through a master plan approach. Taking a plan-led approach to development in this location presents the opportunity to design and create a landscaped western gateway into the borough framed by a landscaped buffer along the whole of the western boundary of the borough, both to the north and south of the A130 creating an attractive, high quality development and environment. The master plan will also set out the detailed infrastructure requirements as outlined in the policy and the phasing.
	38	Paragraph 10.14	~~Furthermore, such a~~ The provision of a landscape buffer provides the opportunity to create a strategic greenway running north south along eastern boundary, which can incorporate accessible public footpaths and cycleways, linking to existing and proposed footpaths, cycle routes, open spaces, and natural features. It also provides the opportunity to effectively integrate biodiversity into the development through the creation of a community woodland which will also lessen the visual impact of the development. Due to the location of this site, and the scale of development proposed, it will be necessary for the master plan for this site to be accompanied by a project level Habitats Regulation Assessment which ensures that the detailed proposals do not pose a risk of adverse effects to the integrity of the nearby Benfleet and Southend Marshes SPA. On-site green infrastructure provision within this development is expected to play a significant role in ensuring harm is prevented to this off-site natural asset.
	38	Paragraph 10.15	In terms of Green Infrastructure, it is expected that a ~~A~~ master plan will establish how the public open spaces throughout the site are to be utilised. Furthermore, a master plan will need to consider how to integrate any development with the diverse topography of the site, as well as the existing landscape features and the strategic landscape buffer and ~~G~~greenway. ~~The masterplan will set out the detailed infrastructure requirements as outlined in the policy and phasing.~~
	38	Paragraph 10.16	It will also be necessary to demonstrate integration of sustainable drainage techniques as part of the green infrastructure requirements, particularly given the site's topography, and proximity to Flood Zones 2 and 3 to the south east of the site. This will be to ensure that surface water is managed appropriately in order to prevent flooding of properties on or nearby the site. Furthermore, there is existing Anglian Water infrastructure within the boundary of the site. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repairs could be restricted. The layout of any development should

Ref	Page	Policy/ Paragraph	Main Modification
			ensure existing sewers are located within the highway or open space. If this is not possible a formal application to divert these assets may be required.
	38	Paragraph 10.17	To support the scale of the development on this site community infrastructure provision is also required. ~~t~~The development will provide a residential care home, a new co-located primary school with early years and childcare nursery and medical facilities are also required as set out in the *Infrastructure Delivery Plan*. Community Infrastructure, including the residential care home should be appropriately located on site to provide good access to residents, preferably via active travel modes. Guidance should be sought from the relevant infrastructure/service providers in this regard, with ECC setting out detailed guidance on the location for school sites in the *Developers Guide to Infrastructure Contributions.* The *Essex Design Guide* meanwhile provides guidance on the location of accommodation for older people within developments to support their ongoing wellbeing.
	39	Paragraph 10.19	The principal access to the site will be from the A130, but the education and medical facilities will need to be accessible from the existing communities to the east. In providing such access from roads to the east, a no~~t~~ through road ~~(for non-public transport and emergency vehicles)~~ shall be created to the A130, however this route will be accessible for public transport and emergency vehicles only. This is to avoid an alternative through route being created to the detriment of the existing highway network and residential amenity of the area. It is expected that active and sustainable travel infrastructure, facilities and services will be secured alongside the highway improvements, including the provision of a bus service through the site, to which the development will be expected to contribute towards.
	39	Paragraph 10.19	*INSERT NEW PARAGRAPH AFTER PARAGRAPH 10.19 AND RENUMBER ALL REMAINING PARAGRAPHS ACCORDINGLY* Given the location of this site on the borough boundary, the adjoining borough and parish Councils will be invited to be engaged in the master planning process. Due to the highway, education and social care infrastructure requirements it will also be critical to engage with the County Council and other relevant infrastructure and service providers.
	39	Policy HO9	1. Land West of Benfleet, as identified on the Policies Map, is allocated for residential purposes, to deliver around 850 new homes; a ~~nursery and~~ primary school co-located with early years and childcare nursery; medical facilities; a residential care home; and, associated infrastructure as identified in the Infrastructure Delivery Plan. 2. A master plan should be prepared and submitted to the Council for its approval for ~~approach to~~ this site ~~will be taken~~ to ensure that the development is attractively designed, contributing to environmental quality, and that enough infrastructure is provided. The master plan must include the following: a. An urban design framework using a mix of urban design approaches for all development having regard to the local context to create an attractive, green, parkland environment, integrated into the existing landscape and topography; b. A landscape, ecology and biodiversity strategy for the site that includes: i. The provision of a landscaped buffer along the whole of the site's western boundary, to create a green and attractive character to the entrance into the borough; ii. The provision of a strategic greenway running along the whole of the site's eastern boundary, incorporating and linking to existing network of public footpaths, cycleways, public open space including a new community woodland and equipped children's play areas, natural features, and green infrastructure to meet daily recreational needs of new residents and to divert and deflect visitors from Habitats sites; iii. An approach to wildlife that results in a measurable net gain in biodiversity; iv. Retains, as far as possible, the established hedgerow field boundaries; v. Access to the adjoining allotments and recreational open space; vi. An increase in public open space provision across the site, including additional children's play areas; and vii. Sustainable drainage measures will be implemented to ensure no increase in the risk of surface water flooding to the site or nearby properties. c. The principal access to the site from the A130 Canvey Way, comprising a roundabout junction and a segregated northbound carriageway for existing traffic which will be provided before the homes are occupied. Access from the existing highway network to the east shall be restricted to accessing the school and medical facilities only and no through route shall be created, except for public transport and emergency services. The installation of a roundabout will be dependent on the outcomes of a transport modelling exercise to determine the impact of the strategic route network and any mitigations required, including increased capacity on the A130 northwards of the roundabout to Sadlers Farm and improvements to the slip road from Canvey Way to A13. Active and sustainable travel infrastructure, facilities and services should be provided alongside these highway infrastructure improvements. d. A Community hub at a suitable location within the site with good access to active and sustainable travel modes. This shall comprise: i. 2.9ha of land to deliver a new primary school ~~with commensurate~~ co-located with early years an~~d~~ childcare nursery ~~provision~~, ~~with~~ and associated play space; ii. Land for a 1,500sqm healthcare facility with adequate parking and servicing provision; and iii. A residential care home comprising around 60 bedspaces. e. A development layout which safeguards suitable access for the maintenance of foul and surface water drainage infrastructure, and any other utility assets identified as being present on site. 3. Planning applications for development within the allocation area must have regard to the master plan and must contribute towards the delivery of those elements of the master plan which are necessary to make the proposal for that individual site acceptable in planning terms. 4. Detailed design proposals for the site must have regard to the Council's Residential Design Guidance SPD. 5~~4~~. Ensure access to public transport facilities and services in order to promote sustainable transport patterns.
MM14	40	Paragraph 10.20	This site is approximately 12 ha in size. The northern section of the site fronting London Road has been developed for housing over the past 5 years or has extant planning permission for new homes. The remainder of the site is heavily wooded, interspersed by sporadic dwellings and unmade roads. 0.6 ha of the site has a Local Wildlife Site

Ref	Page	Policy/ Paragraph	Main Modification
			designation of a Lowland mixed deciduous woodland and 0.7 ha of the site is designated as a Potential Local Wildlife Site.
	40	Paragraph 10.21	Any development of this site would need to consider how biodiversity, particularly in relation to the trees and woodland, the topography, as well as the compartmentalised landscape and semi-rural nature of the site, could be effectively integrated into the development, and how an overall net gain in biodiversity could be achieved. Also, any development should take into account the requirements of policy NE4 in relation to Local Wildlife Sites and Potential Local Wildlife Sites. The site is dissected by a number of footpaths, plotland roads and bridleways, some of which are Public Rights of Way, and which should be retained and enhanced.
	40	Paragraph 10.22	The main part of the development could be adjacent to Felstead Road with a ~~of~~ master planned 'Arcadia' urban design approach with discrete groupings of dwellings, and create an attractive green, woodland environment where the natural environment and residential homes co-exist side by side. This environment should include open spaces, pocket woodlands, and greenways which create links to be enjoyed by all. This should be integrated into the development already underway on the northern part of the site adjoining the A13. The master plan for this site will be prepared and approved by the Council with input from landowners, key stakeholders and the public. The master plan will set out how applications for different parcels of land within the site can come forward.
	40	Paragraph 10.23	The site is allocated for ~~a total of~~ around ~~183~~ 185 dwellings. A higher density of development has been secured through consents on the frontage of the London Road where there is outstanding planning permission for ~~of which 22~~ 24 flats, and where ~~have permission and~~ 60 flats have been built. The Large Site Capacity Assessment 2019 reviewed the potential for the remainder of the site. Taking into account environmental constraints and the character of the area, this concluded that around a further 101 homes could be secured. ~~This leaves 101 homes to be built.~~ However, as the site is already scattered with houses, the replacement or retention of these dwellings, ~~leaves a remaining~~ would deliver a net addition of around 89 ~~units~~ new homes. Therefore, this policy only sets out the requirement for the remaining net ~~additional 89 units~~ provision.
	41	Paragraph 10.25	Given the proximity to the two primary schools and the access onto the A13, consideration should be given to how additional traffic flows in the area around this site will be accommodated and directed to minimise off-site junction congestion and any negative impact on the environment around the schools. The need for improving public transport facilities and services to encourage their use is required.
	41	Policy HO10	*DELETE WORDING OF POLICY HO10 AND REPLACE WITH THE BELOW TEXT* ~~1. Land between Felstead Road and Catherine Road, Benfleet, as identified on the Policies Map, is allocated for residential purposes, to deliver up to 89 additional new homes by 2033.~~ ~~2. A master plan approach to this site will be taken to ensure that the development is attractively designed, contributing to environmental quality, and that sufficient infrastructure is provided to support growth in this location. The master plan must deliver the following:~~ ~~a. An Arcadia urban design approach, to create an attractive green, wooded environment, integrated into the existing landscape and topography;~~ ~~b. An approach to wildlife that results in a net gain in biodiversity;~~ ~~c. Respects and retains, as far as possible, the hedge and tree-lined established plot boundaries;~~ ~~d. The provision of greenways and public pathways through the site, linking to the existing network of green infrastructure;~~ ~~e. An increase in public open space provision across the site, delivering additional accessible natural green space and children's play equipment; and~~ f. ~~Sustainable drainage measures will be implemented to ensure no increase in the risk of surface water flooding to the site or nearby properties~~ ~~3. Detailed design proposals for the site must have regard to the Council's Residential Design Guidance SPD.~~ ~~4. Development of homes on this site will require improvements to public transport waiting facilities and junction improvements to access on Kent's Hill Road and the A13.~~ 1.Land between Felstead Road and Catherine Road, Benfleet, as identified on the Policies Map, is allocated for residential purposes, to deliver around 89 additional new home by 2033. 2.The site is comprised of two distinct development areas: a. Land south of Bowers Road and between Felstead Road and Downer Road b. Land to the east of Downer Road 3. A master plan approach should be taken which establishes the capacity and access arrangements for each development area within the overall site and secures: a. Urban design which echoes the principles of the Arcadia approach as defined in Appendix 2, to create an attractive, green, parkland environment integrated into the existing landscape; b. A comprehensive strategy for wildlife protection, management, mitigation and compensation for the allocation area that results in a measurable net gain in biodiversity; c. A comprehensive Green Infrastructure Strategy which: i. Ensures the retention of existing Public Rights of Way and through a comprehensive approach identifies where new greenways should be provided to enhance opportunities for active travel and recreation to meet daily recreational needs of new residents and to divert and deflect visitors from Habitats sites; ii. Identifies where new public open space provision should be secured within the allocation area, to deliver accessible natural green space and children's play equipment.

Ref	Page	Policy/ Paragraph	Main Modification
			d. A comprehensive approach to securing sustainable drainage measures which integrates with Green Infrastructure provision and ensures that there is no increase in the risk of surface water flooding to any of the proposed development areas within the allocation, or to existing properties nearby. e. General design principles for the site which will ensure development is well landscaped and integrated into the existing landscape and topography, respecting and retaining as far as possible existing hedge and tree-lined plot boundaries. 4. Detailed applications for individual development sites within the allocation area must have regard to the master plan and must contribute towards the delivery of those elements of the master plan which are necessary to make the proposal for that individual site acceptable in planning terms. 5. Detailed design proposals for individual development sites within the allocation must have regard to the Council's Residential Design Guidance SPD. 6. Development of homes within this allocation should ensure that any local environmental impacts around the adjacent primary schools are minimised and will be required to deliver necessary improvements to public transport waiting facilities and junction improvements on Kents Hill Road and the A13.
MM15	42	Paragraph 10.26	This site is approximately 1.95 ha in size. The site is bounded on three sides by residential development, with the Hadleigh Castle and Marshes Historic Natural Landscape to the east. A Site of Special Scientific Interest (SSSI) sits adjacent to the south-eastern corner of the site within the Historic Natural Landscape. The site itself is open land bisected through the centre in a north south direction by a bank of hedgerow trees and scrub. The topography of the site is challenging, sloping upwards in both a west to east direction and north to south, resulting in the south eastern section of the site being highly prominent.
	42	Paragraph 10.28	It will also be necessary to demonstrate integration of sustainable drainage techniques, to ensure that surface water is managed appropriately in order to prevent flooding of properties on or nearby the site, given the site's topography, its location within a Critical Drainage Area, and immediately adjacent to a potential surface water flooding location. This can be achieved through the provision of open space and Green Infrastructure that will also provide benefits in terms of recreation, nature conservation and active travel. It may be necessary for sustainable drainage measures to be provided on adjacent Green Belt land to the east of the site, such measures may be above or below ground and appropriate engineering works may be required. Due to the Green Belt designation on the adjacent land such measures are required to be compatible with the Green Belt and maintain openness. *INSERT TWO NEW PARAGRAPHS AFTER PARAGRAPH 10.28 AND RENUMBER THE REMAINING PARAGRAPHS THEREAFTER ACCORDINGLY* Alongside demonstrating that sustainable drainage measures can be implemented to manage flood risk on this site, measures should also be undertaken to ensure land stability is achieved and the development does not pose a risk to neighbouring or nearby properties. The NPPF directs that assessments of land stability should be carried out by a competent person and the developer is responsible for ensuring that the development is safe in relation to land stability. A high-pressure underground gas pipeline that runs from north to south is adjacent to the site boundary. Any development or tree planting on this site should have regard to restrictions on the types permitted within specific buffer zones from the edge of the pipeline. Applicants must consult with relevant bodies on the types and location of development or planting in the development brief preparation and at the planning application stage.
	42	Paragraph 10.29	… Having regard to this design approach, it is considered that ~~up to~~ around 30 homes could be accommodated across the site.
	42	Paragraph 10.29	*INSERT A NEW PARAGRAPH AFTER PARAGRAPH 10.29 AND RENUMBER THE REMAINING PARAGRAPHS THEREAFTER ACCORDINGLY* Highway access to this site is from Glyders. However, this site is close to Benfleet Railway Station which is a public transport hub providing opportunities for residents of this site to travel via multiple modes. This site is also adjacent to the western extent of Hadleigh Castle Country Park and the Public Rights of Way network, providing opportunities for active leisure within the vicinity of this site. The proposals for this site, and associated transport infrastructure improvements should focus on enhancing these active and sustainable travel linkages to promote active travel and to improve connectivity for the future occupants of this site.

Ref	Page	Policy/ Paragraph	Main Modification
	42	Policy HO11	1. Land off ~~the~~ Glyders, Benfleet, as identified on the Policies Map, is allocated for residential purposes, to deliver ~~up to~~ around 30 new homes by 2033. 2. ~~It is expected that a~~ A development brief will be prepared ~~approach to~~ for this site and applications must have regard to the development brief ~~will be taken~~ in order to ensure that the development is of a high quality and responds to local circumstances. The development must: a. Adopt a Contextual approach to urban design in order to integrate with the existing built form and existing landscape, the topography and the Historic Natural Landscape; b. Deliver a landscape strategy that comprises mature planting along the eastern boundary of the site; c. Make provision for open spaces and green infrastructure within the site, with links to existing green infrastructure to meet daily recreational needs of new residents and to divert and deflect visitors from Habitats sites; d. Adopt an approach to wildlife that protects and enhances the adjacent SSSI, and results in a measurable net gain in biodiversity; e. Sustainable drainage measures will be implemented to ensure no increase in the risk of surface water flooding to the site or nearby properties. This may include the provision of attenuation and conveyance of water on land adjoining the allocation, provided such measures do not harm the Green Belt except in very special circumstances; ~~and~~ f. Measures will be implemented by the developer to ensure no increase in the risk of land instability to the site or nearby properties; and ~~f~~ g. Main vehicular access to the site will be from Glyders, with improvements also made to active and sustainable travel infrastructure, facilities and services nearby the site to promote modal shift and improve connectivity to services, jobs and to the natural environment. 3.Detailed design proposals for the site must have regard to the Council's Residential Design Guidance SPD.
MM16	43	Paragraph 10.31	The site is ~~classed as~~ adjacent to a flood storage area as classified by the Environment Agency. The South Benfleet Playing Fields flood storage area, which is recognised by the Environment Agency as a large raised reservoir under the Reservoirs Act provides a 1 in 1,000-year standard of protection to people and property at the southern end of Benfleet Hall Sewer. Benfleet Hall Sewer is adjacent to the site, and therefore the site itself is within a Critical Drainage Area and is located in flood zones 2 and 3a. It is therefore ~~it is~~ essential that tidal, fluvial and surface water is managed appropriately on this site in order to prevent flooding of properties on or nearby the site. This may require flood attenuation mitigations within ~~Richmond Park~~ the open space provision nearby. ~~Benfleet Hall Sewer enters the South Benfleet Playing Fields flood storage area, which is recognised by the Environment Agency as a large raised reservoir under the Reservoirs Act. This flood storage area provides a 1 in 1,000 year standard of protection to people and properties at the southern end of Benfleet Hall Sewer.~~
	43	Paragraph 10.31	*INSERT A NEW PARAGRAPH AFTER PARAGRAPH 10.31 AND RENUMBER ALL PARAGRAPHS THEREAFTER ACCORDINGLY* Further to the matters above, there are existing foul and surface water sewers in Anglian Water's ownership within the boundary of this site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highway or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.
	43	Policy HO12	1.The site of the former WRVS Hall, Richmond Avenue, Benfleet, as identified on the Policies Map, is allocated for residential purposes, to deliver ~~up to~~ around 39 new homes by 2033. 2.A development brief ~~approach~~ will be prepared for ~~taken to~~ this site, and should follow a village green urban design approach. Applications must have regard to the development brief in order to ensure that the development is of a high quality and responds to local circumstances. The development must deliver the following: a. High quality design and layout which integrates into the existing landscape; b. An approach to wildlife that results in a measurable net gain in biodiversity; c. The provision of open space across the site, delivering accessible natural green space and greenways through the site, linking to the existing network of green infrastructure to meet daily recreational needs of new residents and to divert and deflect visitors from Habitats sites; d. The management of tidal flood risks from the Thames Estuary and fluvial flood risks from the Benfleet Hall Sewer; e. Sustainable drainage measures ~~will be implemented~~ to ensure no increase in the risk of surface water flooding to the site or nearby properties. No development shall impede ~~upon~~ or impact on the flood storage area ~~in Richmond Park~~ at South Benfleet Playing Fields;~~.~~ f. Improvements to the footpaths and cycleways through ~~Richmond Park.~~ South Benfleet Playing Fields; g. The safeguarding of suitable access for the maintenance of foul and surface water drainage infrastructure; and h. Main vehicular access to the site will be from Richmond Avenue. 3. Detailed design proposals for the site must have regard to the Council's Residential Design Guidance SPD

Ref	Page	Policy/ Paragraph	Main Modification
MM17	44	Paragraph 10.33	This site is approximately 28 ha in size. In the eastern part of the site, 3.5ha is designated as part of a Historic Natural Landscape. This eastern edge also coincides with the extent of the Little Haven Complex nature reserve managed by Essex Wildlife Trust. The Cottage plantation woodland reserve (now known as the Valerie Wells Wood) sits nearby to the south-east of the site. The site itself is mainly open farmland which is compartmentalised by established hedge and tree lined field boundaries. There is a cluster of existing farm buildings occupied by several small commercial uses, as well as some stables located to the southern part of the site. An existing community use fishing lake is also contained within the site.
	44	Paragraph 10.34	Any development in this location should seek to follow urban design approaches, which ensure ~~low density and~~ integration into the existing landscape.
	44	Paragraph 10.35	Given the mainly undeveloped nature of the site, and the ancient landscape area a master plan would need to consider how biodiversity, the topography, the compartmentalised landscape and semi-rural nature of the site could be effectively integrated into the development, and how an overall net gain in biodiversity could be achieved. Buffering should be provided to the Little Haven Complex, and consideration should be given as to how additional recreational disturbance of nearby wildlife assets should be avoided.
	44	Paragraph 10.36	Due to the size of the site, its varying landscape and neighbouring land uses there is the opportunity to integrate several different urban design approaches. The 'Arcadia' approach is considered appropriate for the areas of the site located within the Historic Natural Landscape and in the vicinity of important landscape features within the site, with the Boulevard approach being appropriate for the main routes through the site. Any entrances to this site lend themselves to being designed using elements of the Major Entry Point urban design approach. It is considered with these main urban design approaches setting the framework for the site, the remainder of development could result from a combination of the other urban design approaches set out in Appendix Two. All approaches should be linked together by public open spaces, and greenways which provide multi-user access ~~to all~~ and connect to the wider network. Having regard to these design approach, it is considered that approximately 455 homes could be accommodated across the whole site.
	44	Paragraph 10.37	It will also be necessary to demonstrate integration of sustainable drainage techniques, to ensure that surface water is managed appropriately in order to prevent flooding of properties on or nearby the site. This can be achieved through the provision of open space and Green Infrastructure that will also provide benefits in terms of recreation, nature conservation and active travel. Additionally, there are existing foul and surface water sewers in Anglian Water's ownership within the boundary of the site and the site layout will need to be designed to take these into account. The existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance or repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.
	45	Paragraph 10.40	Community facilities should be provided in the form of ~~local shops,~~ an early years and childcare nursery, a multi-purpose community hall (equivalent to being able to accommodate a minimum of 2 badminton courts in terms of size and height), the need for which is identified through the *Castle Point Built Facilities Strategy 2018,* and a healthcare facility to serve the Daws Heath area comprising 750 - 1000sqm of floorspace, as required by the NHS Mid and South Essex STP.
	45	Policy HO13	1. Land east of Rayleigh Road, Hadleigh, as identified on the Policies Map, is allocated for residential purposes, to deliver around 455 new homes by 2033. 2. A master plan should be prepared and submitted to the Council for its approval for ~~approach to~~ this site to ensure ~~will be taken to ensure~~ that the development is attractively designed, contributing to environmental quality, and that infrastructure is provided to support growth in this location. The master plan must deliver the following: a. Access arrangements for the site, which also addresses peak time congestion at nearby junctions; b. An urban design framework using a mix of urban design approaches built around the Arcadia approach in areas located within the Historic Natural Landscape and in the vicinity of important landscape features, and the Boulevard and Major Entry Point approaches, to create an attractive green, parkland environment, integrated into the existing landscape and topography; c. Respects and retains as a far as possible the hedge and tree-lined boundaries established; d. An approach to wildlife that results in a measurable net gain in biodiversity, including the provision of a buffer to the Little Haven Complex nature reserve; e. The provision of greenways providing multi-user access through the site, linking to the existing network of green infrastructure which provide opportunity for active travel and recreation but which avoid or otherwise manage additional recreational disturbance to sensitive wildlife assets nearby; f. An increase in public open space provision across the site consistent with the requirement of policy HS3, delivering children's play equipment and additional accessible natural green space ~~and children's play~~

Ref	Page	Policy/ Paragraph	Main Modification
			~~equipment~~ to meet daily recreational needs of new residents and to divert and deflect visitors from Habitats sites; g. Sustainable drainage measures will be implemented to ensure no increase in the risk of surface water flooding to the site or nearby properties; h. The provision of a multi-use community hall, and the provision of land or a suitable building to provide up to 1000sqm of space for healthcare services ~~building on site~~; i. Provision of 0.13ha of land ~~Land (circa 0.13 hectares)~~ for a stand-alone early years and childcare nursery; j. Main vehicular access will be taken from Stadium Way in the north and Daws Heath Road in the south. k. Safeguarding of suitable access for the maintenance of foul and surface water drainage infrastructure, and any other utilities infrastructure identified on site. 3. Planning applications for the development within the allocation area must have regard to the master plan and must contribute towards the delivery of those elements of the master plan which are necessary to make the proposal for that individual site acceptable in planning terms. ~~3~~4. Detailed design proposals for the site must have regard to the Council's Residential Design Guidance. ~~4~~5. ~~Public transport waiting facilities and services must be improved on Rayleigh Road and Daws Heath Road.~~ Improvements to active and sustainable infrastructure, facilities and services should be secured within and as part of this development to promote modal shift and improve connectivity. This should include a public transport only route through the site, bringing all new homes on the site within 400m of public transport provision.
MM18	46	Paragraph 10.42	Given the mainly undeveloped nature of the site, any development of this site would need to consider how biodiversity could be effectively integrated into the development and an overall net gain in biodiversity could be achieved. Furthermore, the compartmentalised landscape and semi-rural nature of the site are important features and should be used to aid the integration of development into this important landscape. The development must provide access to the open areas to the south and ~~west~~ east of the site whilst ensuring they are protected and enhanced. This area of land, as identified in the Policies Map as 'new open space' can be utilised for compensatory improvements to the environmental quality and accessibility of remaining Green Belt land, so long as the use is compatible with the functions of Green Belt policy.
	46	Paragraph 10.44	The overall design for the site should ensure linkages to nearby public open spaces, and greenways providing multi-user access through the site and linking to adjacent land. It will also be necessary to demonstrate integration of sustainable drainage techniques, as the site is identified as being in a Critical Drainage Area. This can be achieved through the provision of open space, greenways and Green Infrastructure. Having regard to these design approaches, it is considered that approximately 173 homes could be accommodated across the whole site.
	46	Paragraph 10.45	There are plenty of opportunities within the vicinity of this site for walking, cycling and horse riding for leisure purposes, and new or improved links to this network should be provided. However, t~~T~~his site is not within easy walking distance of local services and facilities and it is therefore important that cycling infrastructure, and public transport services are improved, in terms of routing and frequency, in this part of the borough.
	46	Paragraph 10.46	*INSERT A NEW PARAGRAPH AFTER PARAGRAPH 10.46 AND RENUMBER REMAINING PARAGRAPHS THEREAFTER ACCORDINGLY.* Anglian Water has identified existing foul and surface water sewers within the boundary of this site which they own, and which need to be taken into account in the site layout. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in the highway or in public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.

Ref	Page	Policy/ Paragraph	Main Modification
	47	Policy HO14	1. Land at Brook Farm, Hadleigh, as identified on the Policies Map, is allocated for residential purposes, to deliver ~~up to~~ around 173 new homes by 2033. 2.~~It is expected that a~~ A master plan should be prepared and submitted to the Council for its approval for this site. ~~approach will be taken to this site, using~~ . The master plan should incorporate ~~using~~ multiple urban design approaches to ensure that the development is of a high quality and responds to local circumstances. 3. The development should: a. Adopt a Contextual approach to urban design to the northern parts of the site immediately adjacent to the existing development in order to integrate with the existing built form; b. Adopt the Arcadia approach to urban design across the southern parts of the site adjacent to the open farmland in order to integrate with the semi-rural environment; c. Deliver a landscape strategy that comprises mature planting along the southern boundary of the site; d. Respects and retains, as far as possible the established hedge and tree-lined field boundaries; e. Make provision of multi-user greenways through the site, linking to the existing network of green infrastructure and providing opportunities for active travel and daily recreation and to divert and deflect visitors from Habitats sites; f. Adopt an approach to wildlife that results in a measurable net gain in biodiversity. This may include habitat enhancement on land adjoining the allocation, provided such measures are compatible with the Green Belt; g. Sustainable drainage measures will be implemented to ensure no increase in the risk of surface water flooding to the site or nearby properties. This may include the provision of attenuation and conveyance of water on land adjoining the allocation, provided such measures do not harm the Green Belt except in very special circumstances; ~~and~~ h. Take m~~M~~ain vehicular access ~~will be taken~~ from Daws Heath Road; and i. Safeguard suitable access for the maintenance of foul and surface water drainage infrastructure, and any other utility infrastructure identified to be on site. 4. Planning applications for development within the allocation area must have regard to the master plan and must contribute towards the delivery of those elements of the master plan which are necessary to make the proposal for that individual site acceptable in planning terms. ~~4~~5. Detailed design proposals for the site must have regard to the Council's Residential Design Guidance SPD. ~~5~~6. A contribution should be made to the necessary improvement of active and sustainable travel infrastructure, facilities and services for this site, including improvements to cycling infrastructure and public transport services along Daws Heath Road to improve accessibility to the site and reduce the need for travel by car.
MM19	47	Paragraph 10.47	This site is approximately 1.5 ha in size. The site is adjacent to the Hadleigh Infant School and is an undeveloped, unused piece of land fenced off from the school playing fields, which are shared with Hadleigh Junior School. The site is within reasonable walking distance of Hadleigh Town Centre, and opportunities to promote active and sustainable travel to this centre should be secured alongside development.
	48	Policy HO15	1. Land south of Scrub Lane, Hadleigh, as identified on the Policies Map, is allocated for residential purposes, to deliver ~~up to~~ around 55 new homes by 2033. 2. A development brief will be prepared for ~~approach to~~ this site and applications must have regard to the development brief in order ~~will be taken~~ to ensure that the development is attractively designed and contributing to environmental quality. The development brief should deliver the following: a. A Boulevard urban design approach to the Scrub Lane frontage, complemented by a contextual urban design approach to the remainder of the site; b. Access for the school to maintain and improve accessibility to the school from Scrub Lane; c. Provide access to natural greenspace within walking distance to meet daily recreational needs of new residents and to divert and deflect visitors from Habitats sites; ~~c~~d. Sustainable drainage measures will be implemented to ensure no increase in the risk of surface water flooding to the site or nearby properties; and ~~d~~e. Main vehicular access will be taken from Scrub Lane with improvements also made to active and sustainable travel infrastructure, facilities and services nearby the site to promote modal shift and improve connectivity to services and jobs in Hadleigh Town Centre. 3. Detailed design proposals for the site must have regard to the Council's Residential Design Guidance SPD. 4. The loss of playing field land and land last used as playing fields should be mitigated by an appropriate financial contribution being secured towards new or enhanced playing field projects within the Borough.
MM20	49	Paragraph 10.51	The northern edge of the site coincides with a watercourse which puts the northern boundary into a flood risk zone 2 and 3. The overall design for the site should follow the sequential approach and avoid development on land within flood risk zones 2 and 3. Elsewhere within the site development proposals should integrate ~~ensure integration of~~ sustainable drainage techniques, in order to ensure that surface water is managed appropriately. This can be achieved through the provision of open space and green infrastructure that will also provide benefits in terms of

Ref	Page	Policy/ Paragraph	Main Modification
			recreation, nature conservation and active travel. Having regard to these design approaches it is considered that 65 homes could be accommodated on this site.
	49	Paragraph 10.52	Given the mainly undeveloped nature of this site and the proximity to a Potential Local Wildlife Site and SSSI, any development of this site would need to consider how biodiversity could be effectively integrated into the development, impacts on the SSSI can be avoided, managed or mitigated, and an overall net gain in biodiversity could be achieved. The use of landscaping to mitigate the impacts of the development on the semi-rural landscape in this location could for example provide the opportunity to create wildlife corridors that link the network of woodlands and support this areas role as a Historic Natural Landscape. Vehicular access to the site will be from Central Avenue only, in order to avoid conflict with the Public Rights of Way on Poors Lane and to avoid the unnecessary harm to the adjacent Local Wildlife Site and SSSI.
	49	Paragraph 10.53	The *SHLAA 2018* estimates an additional 61 dwellings and this is corroborated by the *Castle Point Large Site Capacity Study* which estimates that the site has a capacity for 65 additional dwellings made up of semi-detached and detached homes as well as open space. ~~The northern part of the site with within Flood Zone 3 and appropriate mitigation should be put in place including on-site SUDS and / or attenuation.~~ Vehicular access to the site should be taken from Central Avenue, with improvements also made to active and sustainable travel within and around the site to promote active travel and access to the countryside in this part of the borough. There is scope for non-vehicular access to be secured from Poors Lane.
	49	Policy HO16	1. Land at Oak Tree Farm, Hadleigh, as identified on the Policies Map, is allocated for residential purposes, to deliver ~~up to~~ around 65 new homes by 2033. 2. ~~It is expected that a~~ A master plan should be prepared and submitted to the Council for its approval for ~~approach will be taken to~~ this site using a contextual urban design approach to ensure that the development is of a high quality and responds to the local circumstances. 3. The development should: a. Adopt a contextual approach to urban design which integrates with the existing built form and is also sensitive to the openness of the surrounding farmland and ancient woodland; b. Adopt the sequential approach and ensure that no housing development is proposed on land within flood risk zones 2 and 3 on the site as defined by the most up to date modelling, and taking climate change into account; ~~b~~c. Implement ~~S~~sustainable drainage measures ~~will be implemented~~ to ensure no increase in the risk of surface water flooding to the site or nearby properties; d. Adopt an approach to wildlife that protects and enhances the adjacent SSSI, and results in a measurable net gain in biodiversity. Where greenways are provided as part of the design for this site, they should avoid or otherwise manage recreational disturbance in the adjacent SSSI including access from Poors Lane to the SSSI. Access should be provided to natural greenspace within walking distance to meet daily recreational needs of new residents and to divert and deflect visitors from Habitats sites; ~~c~~e. Respects and retains, as far as possible the established hedge and tree-lined field boundaries; and ~~d~~f. ~~Main v~~Vehicular access will be taken from Central Avenue only, with improvements also made to active and sustainable travel infrastructure, facilities and services nearby the site to promote modal shift and improve connectivity to services, jobs and to the natural environment.~~;~~ 4. Planning applications for development within the allocation area must have regard to the master plan and must contribute towards the delivery of those elements of the master plan which are necessary to make the proposal for that individual site acceptable in planning terms. ~~4~~5. Detailed design proposals for the site must deliver a mix of high quality, sustainable homes, having regard to the Council's Residential Design Guidance SPD.
MM21	50	Paragraph 10.55	Control of the land is vested in the County Council and Borough Council, both of whom aspire to bring forward mixed use redevelopment in order to support the town centre. The site will be subject to a development brief ~~master plan~~ which sets out how the new development can be integrated into the existing fabric of the town centre; seek to retain if viable the old fire station; retain and provide facilities for the community uses on the site; provide commercial ground floor opportunities; and residential development. The proposals for this site will seek to support and contribute towards opportunities to promote active and sustainable travel in this already accessible location.
	50	Paragraph 10.56	This site is identified as being within a Critical Drainage Area and within the Southend Water Recycling Centre catchment area, and it is necessary to ensure that surface water is managed appropriately in order to prevent flooding of properties on or nearby the site. Anglian Water has also identified the presence of existing surface water sewers on this site, and these will need to be considered in the layout of the development. This existing infrastructure is protected by easements and should not be built over or located in private areas where access for maintenance and repair could be restricted. The existing sewers should be located in the highway or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.

Ref	Page	Policy/ Paragraph	Main Modification
	50	Policy HO17	1. Land at Hadleigh Island, Hadleigh, as identified on the Policies Map, is allocated for mixed use residential purposes, to deliver ~~up to~~ around 52 new homes by 2033. 2. ~~It is expected that a planning and development brief approach will be taken to this site,~~ A development brief will be prepared for this site and applications must have regard to the development brief in order to ensure that the development is of a high quality and responds to local circumstances. The development brief will use ~~ing~~ a contextual urban design approach. 3. A ~~master plan~~ development brief for the site should deliver: a. A high-quality design and layout which complements the existing urban environment and seeks to enhance the character of the town centre; b. Enhancements to the public realm within the site and along the A13 frontage, including contributions towards active and public transport provision within the vicinity of the site to promote modal shift in a town centre location; c. Enhancements to the public realm within the site and along the A13 frontage; ~~and~~ d. Provide access to natural greenspace within walking distance to meet daily recreational needs of new residents and to divert and deflect visitors from Habitats sites; ~~d~~e. Sustainable drainage measures will be implemented to ensure no increase in the risk of surface water flooding to the site or nearby properties~~.~~; and f. Safeguarding of suitable access for the maintenance of surface water drainage infrastructure, and any other utility infrastructure identified within this site. 4. Detailed design proposals for the site must deliver a mix of high quality, sustainable homes, having regard to the Council's Residential Design Guidance SPD.
MM22	51	Paragraph 10.58	Grasmere Road Pastures (PLoWS 8) is a potential wildlife site that lies immediately north and west of the site, therefore it is important for any new development to take into account and achieve an~~d~~ overall net gain in biodiversity. An existing Public Right of Way passes through the site in the form of a bridleway.
	51	Policy HO18	1. Land north of Grasmere Road and Borrowdale Road, Thundersley, as identified on the Policies Map, is allocated for residential purposes, to deliver ~~up to~~ around 30 new homes by 2033. 2. ~~It is expected that a~~ A development brief ~~approach~~ will be prepared for this site ~~will be taken to this site~~ using a contextual urban design approach to ensure that the development is of a high quality and responds to the local circumstances. Applications for this site must have regard to the development brief. 3. The development should: a. Adopt a contextual approach to urban design which integrates with the existing built form and is also sensitive to surrounding uses; b. Implement s~~S~~ustainable drainage measures ~~will be implemented~~ to ensure no increase in the risk of surface water flooding to the site or nearby properties; c. Respects and retains, as far as possible the established hedge and tree-lined field boundaries; d. Retain the existing Public Right of Way passing through the site, and ensure it remains suitable for use as a bridleway; ~~g~~e. Take ~~A~~an approach to wildlife that results in a measurable net gain in biodiversity; f. Provide access to natural greenspace within walking distance needed for daily recreational needs of new residents and to divert and deflect visitors from Habitats sites; and ~~h~~g. Vehicular access will be from Grasmere Road~~, Borrowdale Road,~~ and Silverdale with improvements also made to active and sustainable travel infrastructure, facilities and services nearby the site to promote modal shift and improve connectivity to services, jobs and to the natural environment. 4. Detailed design proposals for the site must deliver a mix of high quality, sustainable homes, having regard to the Council's Residential Design Guidance SPD.
MM23	52	Paragraph 10.65	Access for this site is taken from residential side roads which also serve two primary schools. Public transport services and facilities should also be improved near to the development site on the A13 London Road and Rushbottom Lane. The transport assessment for this site should include the Tarpots junction in order to identify the extent of any improvements needed as a result of the development of the site.

Ref	Page	Policy/ Paragraph	Main Modification
	52	Policy HO19	1. Land at Glebelands, Thundersley, as identified on the Policies Map, is allocated for residential purposes, to deliver ~~up to~~ around 155 new homes by 2033. 2. A master plan should be prepared and submitted to the Council for its approval for this site ~~approach to this site will be taken~~ to ensure that the development is attractively designed, contributing to environmental quality, and that contributions to health and school infrastructure is made to support growth in this location. The master plan must deliver the following: a. An urban design framework using a mix of urban design approaches built around the Arcadia approach with elements of the Village Green and Landscape Square approaches, to create an attractive green, parkland environment, integrated into the landscape; and b. A landscape strategy for the site that includes: i. The provision of a strategic landscaped buffer along the whole of the sites western boundary, to create a green and attractive character to the entrance into the borough; ii. The provision of a strategic greenway running along the whole of the site's western boundary, incorporating and linking to existing network of public footpaths, cycleways, public open space, natural features, and green infrastructure to meet daily recreational needs of new residents and to divert and deflect visitors from Habitats sites; iii. An approach to wildlife that results in a measurable net gain in biodiversity; iv. An increase in public open space provision across the site consistent with the requirement of policy HS3; and v. Sustainable drainage measures will be implemented to ensure no increase in the risk of surface water flooding to the site or nearby properties 3. Planning applications for development within the allocation area must have regard to the master plan and must contribute towards the delivery of those elements of the master plan which are necessary to make the proposal for that individual site acceptable in planning terms. ~~3~~4. Detailed design proposals for the site must have regard to the Council's Residential Design Guidance SPD. ~~4~~5. A contribution will be made towards the improvement of active and sustainable transport infrastructure, facilities and services within and nearby the site in order to encourage modal shift. This includes improvements to public transport waiting facilities and services near to the site ~~in order to promote sustainable travel~~. ~~5~~6. Main vehicular access will be from Glebelands.
MM24	53	Paragraph 10.69	Throughout the remainder of the site it is considered that the principles of an Arcadia urban design approach, as set out in appendix two should be applied to create an attractive green, parkland environment where the natural environment and residential homes co-exist side by side. This environment should include open spaces and greenways which create links and build on the existing public rights of way network which already exists in this location. It should also integrate sustainable drainage techniques given that the site is within a Critical Drainage Area, and there is potential for a small area of surface water flooding towards the north of the site. The *SHLAA 2018* indicated that the site could deliver 476 new homes. Having regard to the most appropriate design approach taking account of landscape constraints, it is considered that approximately 430 ~~350~~ homes could be accommodated on the site.
	54	Paragraph 10.70	Part of the site already has planning permission for 18~~0~~ units, therefore this policy will look to accommodate the remaining ~~340~~ 412 units.
	54	Paragraph 10.70	*INSERT A NEW PARAGRAPH AFTER 10.70, AND RENUMBER ALL PARAGRAPHS THEREAFTER ACCORDINGLY* Due to the existing development in this area, there are existing foul and surface water sewers in Anglian Water's ownership within the boundary of the site. The site layout will therefore need to be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.
	54	Paragraph 10.71	*INSERT A NEW PARAGRAPH AFTER 10.71, AND RENUMBER ALL PARAGRAPHS THEREAFTER ACCORDINGLY* Main vehicular access to the site from the south of The Chase will primarily be from Kiln Road, and land to the north of The Chase will primarily be accessed from Runnymede Chase or Rayleigh Road. There may be limited access from other roads to small pockets of development.
	54	Paragraph 10.72	The site also contains playing fields used by the nearby USP College. These are remote from the college which limits their use. It is intended that these are relocated to facilitate greater use by the community. To enable greater use, it is intended that the relocated provision will principally be in the form of a full size flood lit 3G pitch capable of use for both football and rugby. The location of the new pitch should be determined through the master planning process and ensure that the flood lighting and noise does not give rise to amenity issues for existing or future residents. ~~Any development of these playing fields should be supported by the provision of a new 3G pitch to serve the needs of the college.~~ The relationship between the site and adjoining land uses is critical and the master plan should set out how the site integrates with, inter alia, the USP college campus and the Council Offices and leisure uses off Kiln Road. Land for a new pre-school will also be required to increase capacity within the area as a result of this development.
	54	Paragraph 10.72	*INSERT TWO NEW PARAGRAPHS AFTER PARAGRAPH 10.72 AND RENUMBER ALL SUBSEQUENT PARAGRAPHS ACCORDINGLY* The IDP indicates that specific improvements to community infrastructure are required to support the growth arising at this site. There is a requirement for a 26-place pre-school to be provided. This is in addition to the pre-school which already operates out of Runnymede Hall. There is also a need, as identified by the NHS, for a new healthcare hub in this location comprising between 750sq m and 1,000 sq m of floorspace. It is anticipated that these requirements will be secured alongside the residential development through a master planned approach. It may be that this could be through the reuse of existing buildings if they are available, and if they are suitable for the intended purpose.

Ref	Page	Policy/ Paragraph	Main Modification
			The site is in multiple ownership and lends itself to a multi-phased scheme. In order to ensure a co-ordinated response to development across the site a master plan will be prepared by the Council within six months of adoption of the Local Plan. The master plan will be informed by the development aspirations for the various parcels within the site. The role of the master plan will be strategic place-making, establishing parameters for development and dealing with site wide issues such as drainage, flooding, infrastructure and net biodiversity gain.
	54	Policy HO20	*DELETE WORDING OF POLICY HO20 AND REPLACE WITH THE BELOW TEXT* ~~1. 28ha of land off Kiln Road, Thundersley, as identified on the Policies Map, is allocated for residential purposes, to deliver up to 340 new homes by 2033. It is expected that a comprehensive master plan approach to this site will be taken to ensure that the development is attractively designed, contributing to environmental quality, and that enough infrastructure is provided to support growth in this location.~~ ~~2. A master plan will be required to deliver:~~ ~~a. An Arcadia urban design approach, to create an attractive, green, parkland environment, integrated into the existing landscape;~~ ~~b. An approach to wildlife that results in a net gain in biodiversity;~~ ~~c. Sustainable drainage measures will be implemented to ensure no increase in the risk of surface water flooding to the site or nearby properties;~~ ~~d. The provision of greenways through the site, linking to the existing network of green infrastructure;~~ ~~e. The provision of open space and where appropriate, playing fields within the site consistent with the requirement of policy HS3, delivering additional accessible natural green space;~~ ~~f. Identify means of access to the site without the creation of a through route and highways improvements to the unmade highway sections within the allocated area to ensure the accessibility of new development and junction improvements on Kenneth Road;~~ ~~g. Integration with the USP College and Council Offices and adjoining leisure uses off Kiln Road. This includes the re-provision of a 3G pitch to compensate for the loss of the USP playing pitch if required;~~ ~~h. Land (circa 0.058 ha) for a stand-alone 26 place Pre-school (Use Class D1); and~~ ~~i. Main vehicular access to the south of the Chase will be taken from Kiln Road, and land to the north of The Chase from Runnymede Chase or Rayleigh Road.~~ ~~3. Detailed design proposals for the site must have regard to the Council's Residential Design Guidance SPD.~~ ~~4. Public transport waiting facilities and services will be improved near to the site on Kiln Road, Rayleigh Road and Kenneth Road in order to promote sustainable travel patterns.~~ 1.28ha of land off Kiln Road, Thundersley, as identified on the Policies Map, is allocated for residential purposes, to deliver around 412 new homes by 2033. 2. A master plan covering the allocated 28ha will be prepared for the site to ensure that the development is attractively designed, contributing to environmental quality, and that the identified infrastructure is provided to support growth in this location. The master plan will set out how applications for different development parcels within the site can come forward. 3. A master plan will be prepared within six months of the adoption of the Plan, which will establish the capacities of development parcels within the overall site. Each development parcel should have regard to the master plan which will secure: a. Urban design which echoes the principles of the Arcadia approach as defined in Appendix 2, to create an attractive, green, parkland environment, integrated into the existing landscape; b. An approach to wildlife that results in a measurable net gain in biodiversity; c. The retention of existing Public Rights of Way through the site, and the provision of greenways through the site, linking to the existing network of green infrastructure; d. The provision of open space and where appropriate, playing fields within the site consistent with the requirement of policy HS3, delivering additional accessible natural green space to meet daily recreational needs of new residents and to divert and deflect visitors from Habitats sites; e. An approach to playing pitch provision which fully compensates for any losses arising on site or in an accessible location nearby, and provides for any additional need arising from growth at the site, in consultation with Sport England and the relevant sport governing bodies; f. Main vehicular access to the south of the Chase from Kiln Road, and land to the north of the Chase from Runnymede Chase or Rayleigh Road; g. Coordinated access to the development areas within the site without the creation of a motorised vehicular through route. As appropriate, the need for highways improvements, including to unmade sections of highway within the site will be secured to enable access to new development; h. Active travel connections through the site linking through the new development to the USP College and Council Offices and adjoining leisure uses off Kiln Road; i. The provision of a new stand-alone 26 place Pre-school, and the provision of a building to accommodate 1,000sqm of space for healthcare services. This may be provided in-kind, or through the provision of land

Ref	Page	Policy/ Paragraph	Main Modification
			comprising 0.058ha for the pre-school and 0.3ha for the healthcare building, with proportionate financial contributions towards the delivery of the facilities; j. Sustainable drainage measures to ensure no increase in the risk of surface water flooding to the site or nearby properties; and k. The safeguarding of suitable access for the maintenance of foul and surface water drainage infrastructure, and any other utility infrastructure identified on site. 4. Applications for individual development parcels within the allocated site must have regard to the master plan and must contribute towards the delivery of those elements of the master plan which are necessary to make the proposal for that development parcel acceptable in planning terms. Any applications received in advance of the master plan must incorporate the requirements of part 3 of this policy as appropriate and must not undermine the comprehensive development of the wider allocated site. 5. Detailed design proposals for the site must have regard to the Council's Residential Design Guidance SPD. 6. In order to mitigate impacts of the development at this site on the surrounding road network necessary contributions will be secured towards junction improvements on Kenneth Road, and towards public transport waiting facilities and services nearby the site on Kiln Road, Rayleigh Road and Kenneth Road in order to promote sustainable travel patterns.
MM25	55	Paragraph 10.73	*INSERT AN ADDITIONAL PARAGRAPH AFTER PARAGRAPH 10.73 AND RENUMBER ALL PARAGRAPHS THEREAFTER ACCORDINGLY* This site is adjacent to the Rayleigh Road and has regular bus services passing by and experiences high traffic flows. There is therefore a need for any development in this location to support localised improvements to active travel and enable mode shift to public transport in order for occupants of this site to be able to travel by these means, reducing the impact of this development on local congestion.
	55	Policy HO21	1. Land fronting Rayleigh Road, Thundersley, as identified on the Policies Map, is allocated for residential purposes, to deliver ~~up to~~ around 60 new homes, by 2033. 2. A master plan should be prepared and submitted to the Council for its approval for this site ~~approach will be taken to this site~~ using a contextual urban design approach to ensure that the development is of a high quality and responds to the local circumstances. 3. The development must: a. Deliver a high-quality design and layout which complements the existing urban environment and reflects the surrounding character given the prominence of the site. In particular, the site layout must seek to mitigate against noise impacts arising from surrounding junctions and main roads and respect the surrounding land uses; b. Provide access to natural greenspace within walking distance for daily recreational needs of new residents and to divert and deflect visitors from Habitats sites; ~~b~~c. Sustainable drainage measures will be implemented to ensure no increase in the risk of surface water flooding to the site or nearby properties; and ~~c~~d. Take m~~M~~ain vehicular access ~~will be taken~~ from Kingsley Lane, and contribute towards active and sustainable transport infrastructure, facilities and services nearby the site in order to encourage modal shift. This includes improvements to public transport waiting facilities and services near to the site. 4. Planning applications for development within the allocation area must have regard to the master plan and must contribute towards the delivery of those elements of the master plan which are necessary to make the proposal for that individual site acceptable in planning terms. ~~4~~5. Detailed design proposals for the site must deliver a mix of high quality, sustainable homes, having regard to the Council's Residential Design Guidance SPD.
MM26	56	Paragraph 10.75	This site is approximately 0.16 ha in size and is bounded by residential development on the western, northern and eastern boundaries. Kiln Road offers the southern boundary and will act as the main access to the site. There are existing active and sustainable travel opportunities on Kiln Road, which this development should contribute toward the improvement of in order to support a shift to these modes of travel.
	56	Paragraph 10.76	The site is comprised of a manufacturing commercial business, but located within a predominately residential area, and close to residential property. The site is adjacent to three storey terraced town houses to the west and two storey chalet style homes to the east, with large semi-detached homes on the opposite side of Kiln Road. Based on the scale of surrounding development it is considered that this site can accommodate around 12 new homes.
	56	Paragraph 10.76	*INSERT A NEW PARAGRAPH AFTER PARAGRAPH 10.76 AND RENUMBER ALL PARAGRAPHS THEREAFTER ACCORDINGLY* There is an existing surface water sewer in Anglian Water's ownership within the boundary of this site, and consequently the site layout should be designed to take this into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewer should be located in highway or in public open space. If this is not possible a formal application to divert the asset may be required.

Ref	Page	Policy/ Paragraph	Main Modification
	56	Policy HO22	1. Land at Thames Loose Leaf, Thundersley, as identified on the Policies Map, is allocated for residential purposes, to deliver ~~up to~~ around 12 new homes by 2033. 2. A ~~planning and~~ development brief will be prepared for this site and applications must have regard to the development brief. ~~approach will be taken to this site,~~ This site will use~~ing~~ a contextual urban design approach. 3. The development must deliver: a. A high-quality design and layout which complements the existing urban environment and reflects the character of adjacent uses; b. Sustainable drainage measures will be implemented to ensure no increase in the risk of surface water flooding to the site or nearby properties; ~~and~~ c. Provide access to natural greenspace within walking distance to meet daily recreational needs of new residents and to divert and deflect visitors from Habitats sites; ~~c~~d. Main vehicular access from Kiln Road, and contribute towards active and sustainable transport infrastructure, facilities and services nearby the site in order to encourage modal shift; and e. Safeguarding of suitable access for the maintenance of surface water drainage infrastructure, and any other utility infrastructure identified on this site. 4. Detailed design proposals for the site must deliver a mix of high quality, sustainable homes, having regard to the Council's Residential Design Guidance SPD.
MM27	57	Paragraph 10.78	The site is located on Canvey Island, and as such is located within Flood Risk Zone 3. The *Strategic Flood Risk Assessment (SFRA) Level Two 2018* indicates that this site is at high risk of flooding and therefore its development needs to be considered against the Sequential Test, and Exception Test. The Sequential Test, prepared to accompany this plan, indicates that the site would pass the Sequential Test in attempting to deliver the objectively assessed need for housing ~~and when it can be demonstrated that there is an insufficient five-year land supply from sites with a lower flood risk~~. It will ~~however~~ be necessary for any planning application to demonstrate that any proposals are designed to meet the Exceptions Test, particularly in relation to flood resistance and flood resilience.
	57	Paragraph 10.79	The *Essex County Council Interactive Flood and Water Management Map* identifies areas of high risk of surface water flooding including areas on Canvey Island. The Canvey Island Six Point Plan is a multi-agency plan which sets out how surface water flood risk on Canvey should be managed. This includes increasing the capacity of the drainage network and investing in green surface water storage. On this site there are existing drainage ditches running along the southern and part of the eastern boundary of the site. It will therefore be necessary to demonstrate integration of sustainable drainage techniques, to ensure that surface water is managed appropriately in order to prevent flooding of properties on or nearby the site. This can be achieved through the provision of open space and Green Infrastructure that will also provide benefits in terms of recreation, active travel and nature conservation, including helping to ensure the integrity of the nearby Benfleet and Southend Marshes SPA and Ramsar site by assisting in the management of water quality. ~~and active travel~~.
	57	Paragraph 10.79	*INSERT A NEW PARAGRAPH AFTER PARAGRAPH 10.79 AND RENUMBER ALL PARAGRAPHS THEREAFTER ACCORDINGLY* There are also built drainage assets on this site. There is an existing foul sewer and a number of discharge points (both foul and surface water) in Anglian Water's ownership within the boundary of the site. The site layout will therefore need to be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewer should be located in a highway or public open space. If this is not possible a formal application to divert this asset may be required. There is also a foul sewerage pumping station adjacent to this site. Improvements may be required to this pump to accommodate the development of this site. To avoid odour complaints arising from any new residents, a 15m buffer should be applied around the pumping station.
	57	Paragraph 10.80	This site is nearby the Canvey Wick SSSI, valued for its invertebrate species. Due to the sites ~~its~~ undeveloped nature it is necessary for ecological survey work to be undertaken having regard to invertebrates, flora, reptiles and nesting birds. Consideration should be given as to how any biodiversity can be effectively integrated into the development proposals to achieve a net gain.
	57	Paragraph 10.80	*INSERT TWO NEW PARAGRAPHS AFTER PARARAPH 10.80 AND RENUMBER SUBSEQUENT PARAGRAPHS ACCORDINGLY* A Scheduled Monument comprising the remains of a Roman saltern is located to the north-east of this site. A Heritage Impact Assessment has been undertaken in order to understand the implications of development on this heritage asset. There is the potential for development of this site to harm the setting of this scheduled monument, and to disturb archaeology related to the saltern within the wider area. To this end, it is necessary for further archaeological assessment to be undertaken prior to master planning, and for master planning to seek to conserve the scheduled monument, its setting and any archaeological remains of significance related to the saltern. In order to minimise potential impacts to the setting of the Roman Saltern, the openness of the area to the west and north of the Saltern should be retained as far as possible. Development to the boundary would isolate the Roman Saltern from the wider historic marshes to the west. It is recognised that a new access from Canvey Road is required for this development and any such highway should be designed into the landscape respecting the character of the historic setting and reducing the visual impact from the highway. Development should take opportunities to sustain, enhance and protect the significance of the Scheduled Monument, this could include diverting pedestrians away from the historic asset, provision of information boards and fencing.

Ref	Page	Policy/ Paragraph	Main Modification
	58	Policy HO23	1. 16.7 ha of Land east of Canvey Road, Canvey Island, as identified on the Policies Map, is allocated for residential purposes, to deliver ~~up to~~ around 300 new homes by 2033. ~~2. Housing development may be brought forward on this development site only at a time where these is an insufficient supply of land to ensure a five-year housing land supply, thereby passing the sequential test for flood risk.~~ ~~3~~2. A master plan should be prepared and submitted to the Council for its approval for this site ~~approach to this site will be taken~~ to ensure that the development is attractively designed, contributing to environmental quality and that infrastructure is provided to support growth in this location. The master plan must deliver the following: a. Protection of the Scheduled Monument located to the north-east of the site and the preservation and enhancement of its setting. To secure this, any development of the land to the west and the north of the Scheduled Monument which would result in substantial harm to the setting of the Scheduled Monument, or will lead to less than substantial harm to the setting of the Scheduled Monument, will be determined in accordance with national planning policy as set out in the NPPF. b. Preservation of any archaeological remains of significance related to the Scheduled Monument identified within the wider site. This should be informed by detailed heritage assessment work, the scope of which should be agreed with the Council and inform the master plan; ~~a~~c. An urban design framework using a mix of urban design approaches ~~built around the Boulevard urban design approach, complemented with the design of a Major Entry Point to the site~~, to create an attractive, green environment that complements the local landscape; ~~b~~d. A landscape strategy for the site that includes: i. The provision of a strong landscaped buffer along the whole of the sites northern boundary; ii. The provision of greenways running through the site connecting the development with existing residential areas and with open spaces and green infrastructure nearby to meet daily recreational needs of new residents and to divert and deflect visitors from Habitats sites; iii. An approach to wildlife that protects and enhances the nearby SSSI and results in a measurable net gain in biodiversity; iv. The provision of public open space within and on land adjacent to the site including a new community park with play equipment at the southern end of the site. This will be accessible to the new and existing communities; and v. Sustainable drainage measures will be implemented to ensure no increase in the risk of surface water flooding to the site or nearby properties. This may include the provision of attenuation and conveyance of water on land adjoining the allocation, provided such measures do not harm the Green Belt except in very special circumstances. Any sustainable drainage measures taken should take into account the Canvey Island Six Point Plan and the requirements of part 2a of this policy. ~~c~~e. Homes designed to be resistant and resilient to flooding from tidal and surface water sources, ~~and~~ with the provision of safe, on-site refuge facilities. Self-contained residential accommodation at ground level and bedrooms at ground level are not permitted; ~~and~~ f. The safeguarding of suitable access for the maintenance of foul and surface water drainage infrastructure, and other utilities infrastructure identified on the site, and the provision of a 15m buffer around the foul sewerage pumping station located on the south western corner of this site to avoid odour nuisance to any adjoining properties; and ~~d~~g. As identified on the Policies Map, ~~T~~the provision of 6 ha of ~~an area of~~adjacent land to the north east of the site be made available for community uses ~~at the north east corner of the site, adjacent to a new access, of 6 ha in extent~~. 3. Planning applications for development within the allocation area must have regard to the master plan and must contribute towards the delivery of those elements of the master plan which are necessary to make the proposal for that individual site acceptable in planning terms. 4. Detailed design proposals for the site must have regard to the Council's Residential Design Guidance SPD. 5. Homes on this site may not be occupied until such time as: a. A new access to Canvey Road has been created to serve the site ~~comprising a roundabout~~, which is designed to respect the landscape, to preserve the openness of the Green Belt and conserve the significance of the adjacent Scheduled Monument and its setting. Access from Dyke Crescent will be for emergency vehicles only; b. A safe pedestrian crossing route has been provided from the site to the open space located on the western side of Canvey Road; and c. A secondary vehicular access has been created from the site to serve the adjacent secondary school. 6. A contribution towards the improvement of active and sustainable transport infrastructure, facilities and services within and nearby the site in order to encourage modal shift. This includes improvements to public ~~Public~~ transport waiting facilities and services ~~should be improved~~ on Canvey Road ~~in order to promote sustainable travel patterns~~. 7. The main vehicular access to the site will be from Canvey Road.
MM28	59	Paragraph 10.86	The site is located on Canvey Island, as such is located within Flood Risk Zone 3. The *Strategic Flood Risk Assessment Level Two 2018* indicates that this site is at high risk of flooding and therefore its development needs to be considered against the Sequential Test, and Exceptions Test. The *Sequential and Exceptions Test* prepared to accompany this plan indicates that the site would pass the Sequential Test in attempting to deliver the objectively assessed need for housing ~~and when it can be demonstrated that there is an insufficient five-year land supply from sites with a lower flood risk~~. It will ~~however~~ be necessary for any planning application to demonstrate that any proposals are designed to meet the Exceptions test, particularly in relation to flood resistance and flood resilience.
	59	Paragraph 10.87	The *Essex County Council Interactive Flood and Water Management Map* identifies existing drainage ditches running through the site and along the southern and part of the eastern boundary of the site. It will therefore be necessary to demonstrate integration of sustainable drainage techniques, to ensure that surface water is managed appropriately in order to prevent flooding of properties on or nearby the site and ensure that land is safeguarded either side of these drainage ditches to allow for enhancements of the associated flood defences. This can be achieved through the provision of open space and green infrastructure that will also provide benefits in terms of recreation, nature conservation and active travel. The Canvey Island Six Point Plan is a multi-agency plan which sets out how surface water flood risk on Canvey should be managed. This includes increasing the capacity of the drainage network and

Ref	Page	Policy/ Paragraph	Main Modification
			investing in green surface water storage, as suggested above. In managing surface water in this way, the development will be helping to ensure the integrity of the nearby Benfleet and Southend Marshes SPA and Ramsar site through improved water quality.
	59	Paragraph 10.88	This site is nearby the Canvey Wick SSSI, valued for its invertebrate species, and is itself identified as a Local Wildlife Site (CPT4) in the *Local Wildlife Site Register 2019.* It is therefore necessary for ecological survey work to be undertaken having regard to invertebrates, flora, reptiles and nesting birds for this site. Consideration should be given as to how any biodiversity can be effectively integrated into the development proposals to achieve a net gain and ~~or~~ investment made to support biodiversity and the protection of species rich areas in west Canvey. This should include improving access for pedestrians, cyclists and horse riders across Canvey Way to link the site with the West Canvey Marshes and Canvey Wick Nature Reserves. This crossing should include provision for horse riders.
	59	Paragraph 10.88	*INSERT A NEW PARAGRAPH AFTER 10.88 AND RENUMBER SUBSEQUENT PARAGRAPHS ACCORDINGLY* A Grade II listed building, the Dutch Cottage is located adjacent to Canvey Road. A Scheduled Monument comprising a Roman saltern is located further away also to the west. A *Heritage Impact Assessment* has been prepared for this site which recommends that the master plan for this site preserves and enhances the setting of the Dutch Cottage, which historically sat in a rural setting. It also recommends that further archaeological work is undertaken to determine if any significant remains associated with the Roman saltern are present within this site, *albeit* it is removed from the Scheduled Monument. This work should be undertaken prior to the master planning in order to ensure the preservation of any significant assets which may exist.
	60	Paragraph 10.90	Part of the site already has outline planning permission for a 57 bed care home, ~~units,~~ therefore this policy will look to accommodate the remaining 196 units.
	60	Policy HO24	1.Land west of Canvey Road, Canvey Island, as identified on the Policies Map, is allocated for residential purposes, to deliver ~~up to~~ around 196 new homes and a residential care home by 2033. ~~2. Housing development may be brought forward on this development site only at a time when there is an insufficient supply of land to ensure a five-year housing land supply, thereby passing the sequential test for flood risk.~~ ~~3~~2. A master plan should be prepared and submitted to the Council for its approval for this site ~~approach to this site will be taken~~ to ensure that the development is attractively designed, contributing to environmental quality and health and education infrastructure is provided to support growth in this location. The master plan must deliver the following: a. An urban design framework using a mix of urban design approaches built around the Boulevard urban design approach, complemented with the design of a Major Entry Point to the site, to create an attractive, green environment; b. A landscape strategy for the site that includes: i. An appropriate setting for the Grade II Listed Dutch Cottage, and appropriate settings for any archaeological assets of significance identified within this site. This should be informed by detailed heritage assessment work, the scope of which should be agreed by the Council; ~~i~~ ii.The provision of a strong landscaped buffer to the western boundary; ~~ii~~ iii. The provision of greenways running through the site connecting the development with existing residential areas and with open spaces and green infrastructure nearby, including a link across Roscommon Way to the Canvey Wick and West Canvey Nature Reserves for pedestrians, cyclists and horse riders to meet daily recreational needs of new residents and to divert and deflect visitors from Habitats sites; ~~iii~~ iv. An approach to wildlife that protects and enhances the nearby SSSI, and makes space for priority and protected species within the development design and layout, resulting ~~results~~ in a measurable net gain in biodiversity; ~~iv~~ v. The provision of public open space within the site consistent with the requirement of policy HS3; ~~and~~ ~~v~~ vi. Sustainable drainage measures will be implemented to ensure no increase in the risk of flooding to the site or nearby properties. Any sustainable drainage measures taken should take into account the Canvey Island Six Point Plan; and vii. A 19m wide protected zone either side of the Hill Hall Dyke, in order to accommodate any potential enhancements required to the defences along that Dyke over the lifespan of the development. c. Homes designed to be resistant and resilient to flooding from tidal, fluvial and surface water sources, ~~and~~ with the provision of safe, on-site refuge facilities. Self-contained residential accommodation at ground level and bedrooms at ground level are not permitted. 3. Planning applications for development within the allocation area must have regard to the master plan and must contribute towards the delivery of those elements of the master plan which are necessary to make the proposal for that individual site acceptable in planning terms. 4. Detailed design proposals for the site must have regard to the Council's Residential Design Guidance SPD. 5. Public transport waiting facilities and services should be improved on both Canvey Road, and Northwick Road in order to promote sustainable travel patterns. 6. Homes on this site may not be occupied until such time as a new access to the site from either Canvey Road and/or Northwick Road has been created to serve the site.
MM29	61	Paragraphs 10.91 – 10.97	*REPLACE THE REASONED JUSTIFICATION FOR POLICY HO25 IN ITS ENTIRETY* ~~10.91 This site is approximately 28 ha in size. The land is currently in use as a caravan park. However, it benefits from a resolution to grant outline planning consent for housing development and has capacity in the region of 600~~

Ref	Page	Policy/ Paragraph	Main Modification
			~~homes plus a residential institution. A further resolution to grant full planning permission for 118 houses on what is in effect Phase 1 is also in place. The eastern boundary of the site adjoins public open space. Since the start of the Plan period, 1 April 2018, 90 new 'park homes have been built on the site. These are registered for council tax purposes as first homes and occupied all year round. These new homes contribute to the overall supply of housing and are not double counted in this allocation.~~ ~~10.92 The western part of the site falls within the Health and Safety Executive consultation zone drawn around the nearby Calor Gas terminal. This effectively precludes any new residential development at this part of the site, unless the Health and Safety Executive (HSE) advice were to change in the life of the Plan.~~ ~~10.93 As the site is located on Canvey, it was considered against the sequential test, and as far as possible against the exception test as part of the planning application process as well as through the *Sequential and Exceptions Test* to support the Plan. It will however be necessary to demonstrate flood resilience and resistance through the application for detailed matters.~~ ~~10.94 It will also be necessary to demonstrate on-site surface water management when considering detailed matters ensuring that surface water is managed appropriately. This can be achieved through the provision of open space and Green Infrastructure.~~ ~~10.95 The site is adjacent to the coast, and there are opportunities through the design of the development on this site to improve the relationship between the existing urban area and the coast. Boulevards and greenways which integrate Green Infrastructure should be used within the design of this development to draw people towards the coast. Furthermore the entrances to this site lend themselves to being designed using elements of the Major Entry Point urban design approach.~~ ~~10.96 As people are currently living within caravans on this site, it is unlikely that the replacement of these caravans with fewer houses will impact on the capacity of healthcare providers or schools significantly. It is necessary to ensure that public transport provision is extended to service this part of Canvey Island to encourage sustainable travel patterns.~~ ~~10.97 The proposed extension to Roscommon Way runs through the northern part of this site. This road is proposed in order to relieve existing east-west routes on Canvey Island, and it is therefore important that land is safeguarded to enable the delivery of this route to the benefit of all Canvey residents.~~ This site is approximately 28 ha in size. At April 2018 this site was in use as a caravan park having been consented for such use during the 1950's through to the 1970's. At April 2018 this took the form of static caravans stationed in fields across the site. Whilst some of these are traditional holiday lets, a number have fallen into residential use and permanently occupied as such. As of April 2018 there were 590 static caravans providing residential accommodation on the site according to Council Tax data. Since the start of the Plan period, 1 April 2018, work has been undertaken under the existing consents for the siting of caravans to deliver new park homes for permanent occupation as retirement accommodation for the over 55's on the site. The street plan provided for Council Tax purposes indicates that there will be around 820 park homes delivered on this site overall, gradually replacing the existing static caravans and their occupants. At April 2020, 146 new park homes had already been delivered on this site, with construction underway for further provision at that time. This has resulted in the loss of static caravans providing residential accommodation on the site and will continue to do so as further park homes are provided. This site will therefore deliver a net gain of around 230 homes. Given the consents that already exist, the principle of this development, and indeed many of the detailed requirements normally secured through the Local Plan and the subsequent planning consents cannot be addressed through this Local Plan. However, as the site will benefit from a residential allocation going forward, it is important to ensure that critical requirements for this site, if an application for alternative proposals was brought forward during the plan-period, are identified. This will ensure the wellbeing of future residents of the site, the wider population of Canvey Island, and also the wellbeing of the natural environment. A significant issue for this site is its proximity to the Calor Gas terminal located on the site's western boundary. Parts of the site falls within the Health and Safety Executive consultation zone drawn around this terminal. This would normally preclude any new residential development at this part of the site, unless the Health and Safety Executive (HSE) advice were to change in the life of the Plan. Additionally, the Canvey Water Recycling Centre, in the ownership of Anglian Water, is located to the north-west of this site. To avoid impact on residential amenity arising from odours emanating from such facilities it is normal for a buffer of 400m to be maintained around these facilities. Policy 2 of the Waste Local Plan supports this approach and seeks for a Waste Impact Assessment to be prepared where there is a risk of conflict between a waste facility and proposed development to help determine whether the development is appropriate. Such an assessment would normally be required for development on this site. Furthermore, there are other Anglian Water drainage assets within the boundaries of this site. There is an existing rising main (pressurised foul sewer) and the site layout should be designed to take this into account. This sewer is protected by easements and should not be built over of located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located on highway or public open space. If this is not possible, a formal application to Anglian Water to divert the sewer may be necessary. As the site is located on Canvey, it would normally be the case that development proposals be considered against the sequential test, and the exception test. To comply with the exceptions test buildings would normally need to demonstrate that they are flood resilient and resistant. A site level flood risk assessment will be required for any development proposed for this site. In additional to tidal flood risk, there are also issues associated with fluvial flood risk and surface water management in relation to this site, with the fluvial risk arising from the Marine Parade Delph ditch. Surface water management, including the provision of open space, especially close to the ditch, and other Green Infrastructure throughout the site is therefore necessary to reduce risk to properties within the site, and to manage water quality, and consequently the quality of nearby Habitats sites such as the Benfleet and Southend Marshes SPA. The Canvey Island Six Point Plan amongst other measures seeks to implement increased drainage capacity and investment in green surface water storage, both of which should be a consideration for the development of this site. It should be noted that ditch forms ponds to the north of the site, and the ponds and associated reed beds are identified as a priority habitat in the Biodiversity Assessment 2018. The provision of homes on this site should therefore avoid harm to this wildlife asset. Any application for housing on this site will be required to contribute towards affordable housing and community infrastructure provision in line with the requirements of policy, and the needs of infrastructure providers. For clarity policy HO4 will apply to the gross number for any permanent homes provided on this site, as park homes are not

Ref	Page	Policy/ Paragraph	Main Modification
			eligible for vacant building credit as they are not permanent structures. Other contributions will be determined on a case-by-case basis depending on the impact of the proposed development. It should however be expected that family homes will need to make a full contribution towards early years, childcare and education provision, as the current park home development does not generate demand for such services due to its limitations on occupation. In order to ensure good and sustainable access to this site, and to support the wider sustainability of Canvey Island, there is a need for transport improvements associated with this site, which the Council will take every opportunity to secure. The site is located on an existing bus route. Waiting facilities need to be improved in this location to promote take up. This could be supplemented with on-site real time information for residents to promote use of local public transport services.
	62	Policy HO25	*REPLACE POLICY HO25 IN ITS ENTIRETY* ~~1. Land at Thorney Bay Road, Canvey Island, as identified on the Policies Map, is allocated for residential purposes, except for areas shown as the Health and Safety Executive consultation zone, the area reserved for the construction of Phase 3 of Roscommon Way, and the area shown as reserved for future flood defences. It is expected to deliver up to 510 new homes and a residential care home by 2033.~~ ~~2. A master plan approach to this site will be taken to ensure that the development is attractively designed, contributing to environmental quality, and contributions are made to health and education infrastructure to support growth in this location. The master plan must deliver the following:~~ ~~b. A Boulevard urban design approach, complemented with the design of Major Entry Points to the site, to create an attractive green, coastal environment;~~ ~~c. Resilience and resistance to flooding from tidal and surface water sources, and the provision of safe, on-site refuge facilities;~~ ~~d. Sustainable drainage measures will be implemented to ensure no increase in the risk of surface water flooding to the site or nearby properties;~~ ~~e. The provision of greenways through the site, linking to the existing network of green infrastructure and the coast;~~ ~~f. The provision of open space, and an increase in open space across the site consistent with the requirement of policy HS3;~~ ~~g. The provision of greenways throughout the site, with links to existing and proposed green infrastructure and the coast;~~ ~~h. Main vehicular access from Thorney Bay Road;~~ ~~i. A protected line of land for delivery of the Roscommon Way Phase 3;~~ ~~h. A protected zone alongside the existing sea defences, in order to accommodate any potential future enhancements; and~~ ~~i. No development in the Health and Safety Executive consultation Zone~~ ~~3. Detailed design proposals for the site must have regard to the Council's Residential Design Guidance SPD.~~ ~~4. Public transport services and facilities will be improved in Thorney Bay Road and Craven Avenue nearby to provide opportunities for sustainable travel patterns.~~ ~~5. The land safeguarded for Roscommon Way within the site, should be provided for the construction of the new road and to provide access to the new development.~~ 1.Land at Thorney Bay Road, Canvey Island, as identified on the Policies Map, is allocated for residential purposes, except for areas shown as the Health and Safety Executive consultation zone and the area shown as reserved for future flood defences. 2.This site is being redeveloped for the provision of around 820 park homes in the period to 2033 under existing consents for the siting of caravans on this land. This development will secure 230 homes net. 3. Where the Council receives planning applications for residential development on this site, the Council will seek to secure the following: a. No residential development within the Health and Safety Consultation Zone, for the benefit of and safety of future residents; b. No unacceptable impact on future residents arising from odour, and no residential development located so as to act as a determinant to the continuous operation of the Canvey Island Water Recycling Centre. A detailed odour assessment based on summer time emission rates should be used to inform an appropriate distance to be maintained by residential development on this site, and should be submitted with relevant planning applications; c. Sufficient space in order to accommodate any potential future enhancements to the sea defences over the lifespan of the development as required by Policy CC2; d. Safeguarded access for the maintenance of foul drainage infrastructure and any other utilities infrastructure identified on the site; e. Homes designed to be resistant and resilient to flooding from tidal and surface water sources, with the provision of safe, on-site refuge facilities;

Ref	Page	Policy/ Paragraph	Main Modification
			f. Sustainable drainage measures implemented across the site to ensure no increase in the risk of flooding to the site or nearby properties. Any sustainable drainage measures taken should take into account the Canvey Island Six Point Plan; g. A measurable biodiversity net gain at and around the Marine Parade Delph ditch; h. A contribution towards affordable housing provision consistent with the requirements of policy HO4; i. A contribution towards necessary infrastructure provision as determined by infrastructure providers at the time of application having regard to the impact of the proposal; j. Applications for this site must be accompanied by relevant site level flood risk assessments which address the tidal, fluvial and surface water flood risks affecting this site; and k. Provide access for natural greenspace within walking distance to meet daily recreational needs of new residents and to divert and deflect visitors from Habitats sites.
MM30	63	Paragraph 10.100	It will ~~also~~ be necessary to demonstrate on-site surface water management when considering detailed applications as the *Essex County Council Interactive Flood and Water Management Map* identifies areas at risk of surface water flooding within the site. The Canvey Island Six Point Plan is a multi-agency plan which sets out how surface water flood risk on Canvey should be managed. This includes increasing the capacity of the drainage network and investing in green surface water storage. On this site, surface water management should ~~This can~~ be achieved through the provision of open space and Green infrastructure that will also provide benefits in terms of recreation, active travel and nature conservation, including helping to ensure the integrity of the nearby Benfleet and Southend Marshes SPA and Ramsar site by assisting in the management of water quality. ~~and active travel~~.
	63	Paragraph 10.101	The site is adjacent to the coast, and there are opportunities through the design of the development on this site to improve the relationship between the existing urban area and the coast. This site is nearby to Smallgains Marina which provides opportunity for water sports. The creek in proximity to this site is designated as a Sport Opportunity Zone through the *Thames Vision*, and development at this site will need to retain access to the Marina. *SPLIT PARAGRAPH 10.101 INTO TWO PARAGRAPHS AND START A NEW PARAGRAPH WITH THE TEXT BELOW AND RENUMBER SUBSEQUENT PARAGRAPHS THEREAFTER* Given the limited size of the site, its partial containment by the seawall to the north, and its close relationship with the existing residential area to the east, west and south, it is not considered appropriate to apply any of the specific urban design approaches in this instance. The design and development of the site should follow the context appraisal approach, drawing on the analysis of the surrounding built form and constraints, and seeking to integrate any schemes into the existing environment.
	63	Paragraph 10.101	*INSERT A NEW PARAGRAPH 10.101 (AS AMENDED) AND RENUMBER ALL PARAGRAPHS THEREAFTER ACCORDINGLY* In considering the layout of development on this site, it should be noted that there is an existing foul sewer in Anglian Water's ownership on the boundary of this site. This sewer is protected by easements and should not be built over or located in private gardens where access for maintenance or repair could be restricted. The existing sewer and water main should be located in the highway or public open space. If this is not possible a formal application to divert these assets may be required.
	64	Policy HO26	1.Land at Point Road, Canvey Island, as identified on the Policies Map, is allocated for residential purposes, to deliver ~~up to~~ around 100 new homes by 2033. 2. ~~It is expected that a development brief approach will be taken to this site,~~ A development brief will be prepared for this site and applications must have regard to the development brief. This site will use~~ing~~ a contextual approach to urban design, in order to ensure the development integrates with the existing built form and the coastal environment. 3. In order to ensure that the development is of a high quality and responds to local circumstances the development must: a. Make provision for open spaces within the development, linking to existing green infrastructure to meet daily recreational needs of new residents and to divert and deflect visitors from Habitats sites. In addition, maintain ~~and the coast,~~ access to Smallgains Marina for water based recreation; b. Be resistant and resilient to flooding from tidal and surface water sources, and make provision for safe, on-site refuge facilities. Self-contained residential accommodation at ground level and bedrooms at ground level are not permitted; c. Provide main vehicular access from Point Road; d. Sustainable drainage measures will be implemented to ensure no increase in the risk of surface water flooding to the site or nearby properties. Any sustainable drainage measures taken should take into account the Canvey Island Six Point Plan; ~~and~~ e. Safeguard suitable access for the maintenance of foul sewerage and mains water infrastructure, and any other utilities infrastructure identified on this site; and ~~e~~ f. Provide sufficient space for ~~a protected zone alongside of the existing sea defences, in order to accommodate~~ any future potential enhancements to the sea defences over the lifespan of the development in accordance with Policy CC2. 4. Detailed design proposals for the site must have regard to the Council's Residential Design Guidance SPD.

Ref	Page	Policy/ Paragraph	Main Modification
			5. Contribute towards active and sustainable transport infrastructure, facilities and services nearby the site in order to encourage modal shift. Specifically, this site must deliver improvements to public ~~Public~~ transport waiting facilities and services ~~must be improved~~ nearby in Point Road ~~to provide opportunities for sustainable travel patterns.~~ 6. A project level HRA will be required alongside the consideration of the proposal, as per the requirements set out in policy SD1.
MM31	65	Paragraph 10.105	*INSERT A NEW PARAGRAPH AFTER PARAGRAPH 10.105, AND RENUMBER ALL PARAGRAPHS THEREAFTER ACCORDINGLY* There is an existing surface water sewer in Anglian Water's ownership within the boundary of this site and the site layout determined through the detailed application should be designed to take this into account. The existing infrastructure is protected by an easement and should not be built over or located in private gardens where access for maintenance or repairs may be restricted. The existing sewer and water main should be located in the highway or in public open space. If this is not possible a formal application to divert existing assets may be required.
	65	Policy HO27	1.Land at Walsingham House, off Lionel Road, Canvey Island, as identified on the Policies Map, is allocated for residential purposes, to deliver ~~up to~~ around 32 new homes by 2033. 2. It is expected that a ~~planning and~~ development brief approach will be taken to this site, using a contextual urban design approach. 3. Deliver a landscape strategy for the site that includes: a. A high-quality design and layout which complements the existing urban environment and reflects the character of adjacent uses; b. The provision of a strategic landscaped buffers as necessary, to create a green and attractive character; ~~and~~ c. Sustainable drainage measures will be implemented to ensure no increase in the risk of surface water flooding to the site or nearby properties. Any sustainable drainage measures taken should take into account the Canvey Island Six Point Plan; and d. Provide access for natural greenspace within walking distance to meet daily recreational needs of new residents and to divert and deflect visitors from Habitats sites. 4.Homes must be designed to be resistant and resilient to flooding from tidal and surface water sources, ~~and~~ with the provision of safe, on-site refuge facilities. Self-contained residential accommodation at ground level and bedrooms at ground level are not permitted. 5. Detailed design proposals for the site must safeguard suitable access for the maintenance of surface water drainage and mains water infrastructure, and any other utilities infrastructure identified on site, and deliver a mix of high quality, sustainable homes, having regard to the Council's Residential Design Guidance SPD. 6. Main vehicular access from Lionel Road.
MM32	66	Paragraph 10.106	The site is approximately 0.35ha in size and is currently ~~derelict~~ vacant following the ~~closure~~ demolition of the public house and removal of the associated car park~~ing~~. It is located between Winterswyk Avenue and High Street. There is an Anglian Water foul water sewer within the eastern part of the site, a pumping station within the south-east corner of the site, residential development on both the eastern and western boundaries of the site~~,~~ and some commercial uses on High Street.
	66	Paragraph 10.107	The SHLAA 2018 estimates the site has capacity for 40 new residential dwellings. The site has a resolution to grant permission for up to 40 dwellings, but as of 15.06.2021 the Section 106 Agreement has not been completed and no decision notice issued.
	66	Paragraph 107	*INSERT THE FOLLOWING PARAGRAPHS AFTER PARAGRAPH 10.107 AND RENUMBER PARAGRAPHS THEREAFTER ACCORDINGLY* Planning permission was granted for the development of the northern half of the site with eight detached houses on 23rd March 2021. There is an existing foul water sewer in Anglian Water's ownership within the boundary of this site and the site layout determined through the detailed application should be designed to take this into account. The existing infrastructure is protected by an easement and should not be built over or located in private gardens where access for maintenance or repairs may be restricted. The existing sewer should be located in the highway or in public open space. If this is not possible a formal application to divert existing assets may be required. Subject to the appropriate protection and retention of access to the existing foul water sewer crossing the site and the mitigation of the impact of the operation of the foul water pumping station, it is considered that the southern half of the allocated site could accommodate around six additional dwellings of a similar form to that provided to the north.
	66	Policy HO28	1.Land at the Admiral Jellicoe, Canvey Island, as identified on the Policies Map, is allocated for residential purposes, to deliver ~~up to 40~~ around 14 new homes by 2033. ~~2. It is expected that a planning and development brief approach will be taken to this site, using a contextual urban design approach.~~ ~~3~~ 2. In order to ensure that the development is of a high quality and responds to local circumstances the development must deliver: a. A high-quality design and layout which complements the existing urban environment, ~~and~~ reflects the character of adjacent uses and provides suitable access for the maintenance of foul water infrastructure; b. Ve~~a~~hicular access from Point Road and/or Winterswyk Avenue; ~~and~~

Ref	Page	Policy/ Paragraph	Main Modification
			c. Sustainable drainage measures ~~will be implemented~~ to ensure no increase in the risk of surface water flooding to the site or nearby properties. Any sustainable drainage measures taken should take into account the Canvey Island Six Point Plan; ~~.~~ d. Appropriate mitigation of the impact of the operation of the adjoining foul water pumping station on future residentsl and ~~.~~ e. Provide access for natural greenspace within walking distance to meet daily recreational needs of new residents and to divert and deflect visitors from Habitats sites. ~~4~~ 3. Homes must be designed to be resistant and resilient to flooding from tidal and surface water sources, and the provision of safe, on-site refuge facilities; ~~5~~ 4.Detailed design proposals for the site must deliver a mix of high quality, sustainable homes, having regard to the Council's Residential Design Guidance SPD.
MM33	66	Paragraph 10.109	~~10.109~~ 10.124 The *SHLAA 2018* estimates the site has capacity for 10 new residential dwellings. A resolution to grant planning consent on this site for a sheltered accommodation scheme comprising 24 apartments was issued in July 2020.
	67	Policy HO29 Part 1	1. Land south of Haron Close, Canvey Island, as identified on the Policies Map, is allocated for residential purposes, to deliver ~~up to 10~~ around 24 new homes by 2033.
	67	Policy HO29 Part 2	2. It is expected that a ~~planning and~~ development brief approach will be taken to this site, using a contextual urban design approach.
	67	Policy HO29 Part 3	Deliver a landscape strategy for the site that includes: a. A high-quality design and layout which complements the existing urban environment and reflects the character of adjacent uses; b. The provision of strategic landscaped buffers is necessary, to create a green and attractive character; ~~and~~ c. Sustainable drainage measures will be implemented to ensure no increase in the risk of surface water flooding to the site or nearby properties. Any sustainable drainage measures taken should take into account the Canvey Island Six Point Plan; and d. Access for natural greenspace within walking distance needed to meet daily recreational needs of new residents and to divert and deflect visitors from Habitats sites.
MM34	67	Paragraph 10.111	The *SHLAA 2018* estimates the site has capacity for 14 new residential dwellings. Full planning consent for a mixed-use scheme comprising retail units at ground floor and 14 residential apartments above is extant for this site.
	67	Policy HO30 Part 1	1. Land at Haystack car park, Canvey Island, as identified on the Policies Map, is allocated for residential purposes, to deliver ~~up to~~ around 14 new homes by 2033.
	67	Policy HO30 Part 2	2. It is expected that a ~~planning and~~ development brief approach will be taken to this site, using a contextual urban design approach.
	68	Policy HO30 Part 3	In order to ensure that the development is of a high quality and responds to local circumstances the development must deliver: a. A high-quality design and layout which complements the existing urban environment and reflects the character of adjacent uses; b. Main vehicular access from Long Road; ~~and~~ c. Sustainable drainage measures will be implemented to ensure no increase in the risk of surface water flooding to the site or nearby properties. Any sustainable drainage measures taken should take into account the Canvey Island Six Point Plan; and d. Provide access for natural greenspace within walking distance to meet daily recreational needs of new residents and to divert and deflect visitors from Habitats sites.
MM35	68	Paragraph 10.113	The *SHLAA 2018* estimates the site has capacity for 50 new residential dwellings. Access to the site would be by way of the adjoining Kings Park Village using a route set away from the Benfleet and Southend Marshes SPA and Ramsar site to the north to avoid air quality impacts. It is anticipated that this development will form an extension to Kings Park Village.
	68	Paragraph 10.113	*INSERT THE FOLLOWING TWO NEW PARAGRAPHS AFTER PARAGRAPH 10.113 AND RENUMBER PARAGRAPHS THEREAFTER ACCORDINGLY* As this site is within flood risk zone 3, and adjacent to the flood defences, the outcomes of the *SFRA* and the *Sequential and Exceptions Test 2018* are relevant. Development on this site will need to be designed to be resilient and resistant to flood risk and will also need to leave a gap with the existing flood defences to enable those defences to be enhanced in line with the *Thames Estuary 2100 Plan.* The Benfleet and Southend Marshes SPA and Ramsar site is located adjacent to the site, and therefore development on this site needs to be supported by a project level Habitats Regulations Assessment which shows that the integrity of the site is not harmed by the development. This includes, but is not limited to matters of noise disturbance, recreational disturbance, air pollution and water pollution. Measures should be taken within the developments design to avoid impacts including directing vehicle movements to the south of the site and incorporating sustainable drainage in accordance with the Canvey Island Six Point Plan. Furthermore, this greenfield site is adjacent to Canvey Heights Country Park, consideration will also need to be given to securing a biodiversity net gain as part of the development. The site is adjacent to a historic landfill site. It has also been the subject of fly tipping in the past, which was removed at the time. Any planning application would need to have regard to the potential for ground and/or water contamination and meet the requirements of Strategic Policy NE8, and where necessary, deliver a comprehensive remediation strategy prepared in consultation with ECC, as the Waste Disposal Authority.

Ref	Page	Policy/ Paragraph	Main Modification
	68	Policy HO31	1. Land to the east of Kings Park Village, Canvey Island, as identified on the Policies Map, is allocated for residential purposes, to deliver ~~up to~~ around 50 new homes by 2033. 2. ~~It is expected that a planning and development brief approach will be taken to this site,~~ A development brief will be prepared for this site and applications must have regard to the development brief. This site will use~~ing~~ a contextual urban design approach. 3. In order to ensure that the development is of a high quality and responds to local circumstances the development must deliver: a. A high-quality design and layout which complements the existing urban environment and reflects the character of adjacent uses; b. Sustainable drainage measures will be implemented to ensure no increase in the risk of surface water flooding to the site or nearby properties. Any sustainable drainage measures taken should take into account the Canvey Island Six Point Plan; c. Sufficient space ~~A protected zone alongside the existing sea defences~~ in order to accommodate any potential future enhancements to the sea defences over the lifespan of the development as required by Policy CC2; d. An approach to wildlife that results in a measurable net gain in biodiversity; ~~and~~ e. Vehicular access through the existing Kings Park Village~~.~~ ;and~~;~~ f. Provide access to the adjacent Canvey Heights Country Park to meet daily recreational needs of new residents and to divert and deflect visitors from Habitats sites. 4. Homes must be designed to be resistant and resilient to flooding from tidal and surface water sources, ~~and~~ with the provision of safe, on-site refuge facilities. Self-contained residential accommodation at ground level and bedrooms at ground level are not permitted. 5. Development will be expected to deliver an appropriate comprehensive remediation strategy, in consultation with ECC, as the Waste Disposal Authority, to address any outstanding historic contamination issues, and to prevent any new contamination pathways arising. Consistent with the NPPF, the responsibility for delivering the remediation including any ongoing measures will fall to the developer. ~~5~~ 6. Detailed design proposals for the site must deliver a mix of high quality, sustainable homes, having regard to the Council's Residential Design Guidance SPD. 7. A project level HRA will be required alongside the consideration of the proposal, as per the requirements set out in policy SD1.
MM36	69	Paragraph 10.115	This site falls within Hadleigh town centre and as such the development should be fully integrated into the fabric of the town centre, providing an appropriate mix of ground floor commercial opportunities with residential development above. This site is located opposite the Grade I Listed St James the Less Church and there is therefore the opportunity for the redevelopment of this site to enhance both the quality of Hadleigh town centre, and also the setting of this significant heritage asset. A *Heritage Impact Assessment* has been prepared for this site and highlights this opportunity. It is also the case that the development site itself is located on the site of former medieval and post medieval buildings. Archaeological investigation of this site is therefore recommended in between demolition of the existing building and construction of any new development. ~~that create high quality redevelopment in Hadleigh town centre.~~

Ref	Page	Policy/ Paragraph	Main Modification
	69	Policy HO32	1. Land at 244 – 258 London Road, Hadleigh, as identified on the Policies Map, is allocated for mixed use residential purposes, to deliver ~~up to~~ around 50 new homes by 2033. 2 ~~It is expected that a planning and development brief approach will be taken to this site,~~ A development brief will be prepared for this site and applications must have regard to the development brief. This site will use~~ing~~ a contextual urban design approach. 3. A ~~planning and~~ development brief for the site should deliver: a. A high-quality design and layout which complements ~~the existing urban environment~~ and ~~seeks to~~ enhances the setting of the Grade I Listed St James the Less Church and contributes overall to an enhancement of the character of the town centre. b. A mixed-use development of residential and commercial uses; c. Main vehicular access from Castle Lane; d. Enhancements to the public realm within the site and along the A13 frontage,~~;~~ including a contribution towards active and public transport provision within the vicinity of the site to promote modal shift; ~~and~~ e. Sustainable drainage measures will be implemented to ensure no increase in the risk of surface water flooding to the site or nearby properties; and~~.~~ f. Provide access for natural greenspace within walking distance to meet daily recreational needs of new residents and to divert and deflect visitors from Habitats sites. 4. Detailed design proposals for the site must deliver a mix of high quality, sustainable homes, having regard to the Council's Residential Design Guidance SPD. 5. In the period between demolition of the existing building and construction of any new development on this site, archaeological investigation of the site must be undertaken, and any findings recorded in accordance with best practice. The scope of these investigations must be agreed with the Council.
MM37	71	Paragraph 11.4	The key strengths were identified as: low unemployment; reasonable transport links; above average business formation rates and high levels of self-employment indicating entrepreneurial activity; low cost base (premise and wages); and resilient manufacturing base less affected by global pressures. The *South Essex Grow-on Space Study 2019* also concludes that Castle Point has a sufficient supply of start-up and grow-on space accommodation for small businesses looking to establish and grow in the borough. The need to diversify the employment stock to cater for these types of business was assessed as low.
	71	Paragraph 11.5	The key weaknesses were identified as: lack of modern employment premises; out commuting for work; below average skills and workplace wages; low representation in growth and knowledge based sectors; cutbacks in public sector employment; ~~no strong sectors with growth potential businesses;~~ limited attraction to inward investment; and competition from larger centres nearby. The EDNA identifies the main sectors driving growth in South Essex. There are a number of businesses and facilities within Castle Point that contribute to these main sectors and are therefore important to both the Castle Point and wider South Essex economies.
	72	Paragraph 11.8	*INSERT A NEW PARAGRAPH AFTER PARAGRAPH 11.8 AND RENUMBER ALL PARAGRAPHS THEREAFTER ACCORDINGLY* Details of two potential employment sites are set out in the supporting text to policy EC2. Depending on the mix of commercial and industrial uses secured on those sites, they have the potential to deliver between 1,260 and 2,500 additional jobs within the borough over the plan period assuming a mix of B1c/B2 and B8 uses and using the HCA Density Guide Third Edition, 2015.
	72	Paragraph 11.9	It is necessary for this plan to protect ~~both~~ the existing employment sites in Castle Point and to bring forward the potential employment sites, since the EDNA 2017 ~~also found that~~ concluded that there is a need for additional 9ha of employment land in Castle Point. The EDNA 2017 was informed by the emerging Local Plan and the proposed allocations at Canvey Island which are carried forward from the 1998 Local Plan. By allocating the sites on Canvey previously identified in the 1998 Local Plan, there is new employment land provision amounting to 20ha. Whilst this exceeds the need identified through the EDNA 2017, it ensures local business needs are catered for and sustainable access to jobs is secured. It provides a flexible supply of land for commercial purposes to respond to unidentified demands, ensuring that Castle Point provides opportunities for economic investment. ~~there is an additional need of 1 hectare of employment land and 6,605 square metres of space to support employment growth of 462 jobs in Castle Point. including the re-location of industrial needs from London.~~

Ref	Page	Policy/ Paragraph	Main Modification
	72	Policy EC1	1. In order to support the wider economy in South Essex, the economy of Castle Point will be enhanced through: a. The protection of the existing employment land as shown on the policies map for uses principally falling within ~~the~~ Classes B2, B8 and E(g) ~~Use Classes~~ of the Use Classes Order, as far as possible having regard to permitted development rights; b. The retention of the port and port related facilities at South Canvey for the purposes of commercial and industrial activity; and ~~b~~ c. The provision of ~~at least~~ an additional 20~~4~~ hectares of land identified for employment development falling within the ~~B~~ Use Classes B1, B2 and E(g) of the Use Classes Order. ~~; and~~ ~~c. Support for the provision of at least an additional 1 hectare of land and 6,605 square metres of floorspace elsewhere in the borough for employment development falling within the B Use Classes of the Use Classes Order.~~ 2. This will be achieved by: a. Working with partners to deliver improvements to the quality of public space within employment areas in Castle Point, including the quality of open spaces, landscaping, roads, drains and communication infrastructure, and improvement of access for those travelling by active and sustainable modes; b. Encouraging the improvement and redevelopment of private land within existing employment areas in order to enable business growth and improve the attractiveness of these areas; c. Maintaining a flexible employment land supply within established and proposed employment sites identified on the Policies Map, to provide or deliver employment floorspace for employment development falling within the ~~B~~ Use Classes B2, B8 and E(g) of the Use Classes Order; d. Seeking the provision of suitable, flexible floorspace that can be used by office or knowledge-based businesses; and e. Seeking the provision of small business units and specific start-up facilities to support indigenous business growth. 3. Applications for uses falling outside Use Classes B2, B8 or E(g) of the Use Classes Order will be permitted within the employment areas of this plan where they accord with all other relevant policies within this plan, and the following criteria: a. It can be demonstrated that the use will provide an equivalent or greater number of jobs compared to an employment development falling within Use Classes B ~~of the Use Classes Order use of~~ on the site; ~~and~~ b. It can be demonstrated that the ongoing operation of existing businesses nearby will not be adversely affected, and any amenity impacts on the proposals from those existing businesses can be suitably mitigated; and ~~b~~ c. It can be demonstrated that the location of the use within an employment area will not undermine the vitality or viability of local town centres or local shopping parades.
MM38	73	Paragraph 11.13	The South Essex EDNA 2017 identified a need for additional ~~24~~ 9 hectares of employment land to be made available throughout the borough.
	74	Paragraph 11.14	This plan identifies two ~~three~~ locations where new employment uses are proposed: • ~~East of the Manor Trading Estate in Thundersley~~ • Extension to Charfleets Industrial Estate • South of Northwick Road
	74	Paragraphs 11.15 – 11.19	~~East of Manor Trading Estate~~ ~~Land to the east of Manor Trading Estate has been promoted to the Council for employment purposes and appears to be deliverable. It is expected that access to the site will be achieved through the existing estate, or through the redevelopment of some land within the existing estate.~~ ~~The land was designated as Green Belt in the 1998 Castle Point Adopted Local Plan. The Green Belt Review indicated that this site could be removed from the Green Belt without undermining the purpose of the Green Belt in this location.~~ ~~The site was identified as a Potential Local Wildlife Site in the Local Wildlife Site Review as the NPPF expects a net gain in biodiversity, compensation for the loss of biodiversity from the Local Wildlife Site must be provided.~~ ~~Land in this area falls within a Critical Drainage Area (CDA) as identified in the Essex County Council Interactive Flood Map. It is therefore necessary for any development within this area to include appropriate drainage arrangements that do not increase the risk and ideally reduce the risk of flooding to other properties in the area, consistent with criteria set out in the NPPF.~~ ~~This site should be accessed from the Manor Trading Estate only. Highway improvements may be required in the area to support the additional commercial traffic.~~
	74	Paragraph 11.20	The phase 2 extension to Roscommon Way proposed in the 1998 Local Plan has been delivered, which provides access for the site~~, has now been completed~~. There is extant ~~P~~planning ~~permission has also now been granted,~~ consent for a mixed use development on this site, and elements of the scheme have been delivered since 2018. This

Ref	Page	Policy/ Paragraph	Main Modification
			~~and so this~~ site is ~~now~~ therefore considered to be reasonably available for employment development and is considered to be deliverable.
	74	Paragraph 11.21	The *South Essex EDNA 2017* recognises this site as suitable for meeting Castle Point's employment needs. It concludes that this site is appropriate for industrial uses falling within use classes B2 and B8. The extant consent for this site secures 18,300 sq m for industrial uses on this site. Ancillary to this, the site also makes provision for 7,100 sq m of commercial development falling within use class E.
	74	Paragraph 11.24	This site was allocated in the *1998 Castle Point Adopted Local Plan*. Although it has not been developed to date, ~~applications and approvals support employment provision on this site~~ it benefits from detailed extant consent for a mixed use development. To this end, the *EDNA 2017* recognises this site as suitable for meeting Castle Point's employment needs. It concludes that this site is appropriate for industrial uses falling within use classes B2 and B8. The extant consent for this site secures 14,537 sq m for industrial uses on this site. Ancillary to this, the site also makes provision for 9,128 sq m of commercial development falling within use class E and a hotel.
	75	Policy EC2	New employment land as shown on the policies map, is proposed at: ~~Extension to Manor Trading Estate – 3.7 ha~~ Extension to Charfleets Industrial Estate – 10.5 ha South of Northwick Road – 9.7 ha ~~1.With regards to the extension to Manor Trading Estate, the site is an extension to the east of Manor Trading Estate will be made available for employment development falling within Use Classes B1b, B1c and B2, of the Use Classes Order where it can be demonstrated that:~~ ~~a. Access suitable for commercial vehicles has been secured for the extension to the site via the adjacent industrial estate and that appropriate highways improvements are made to the estate roads and junction to accommodate the increased commercial traffic;~~ ~~b. Sufficient and suitable provision has been made for the loss of habitats in order to result in an environmental net gain; and~~ ~~c. Sustainable drainage measures will be implemented to ensure no increase in the risk of surface water flooding to the site or nearby properties.~~ ~~2~~1. The Extension to Charfleets Industrial Estate will be delivered in accordance with extant consents to supply at least 18,300sqm of B Class industrial floorspace, 6,400sqm of E(g) Class business use floorspace, and other commercial premises with a floorspace of up to 1,900sqm. ~~to the south of Charfleets Industrial Estate will be made available for employment development falling within Use Classes B1b, B1c and B2 of the Use Classes Order, where it can be demonstrated that:~~ ~~a. Access suitable for commercial vehicles has been secured for the site via Roscommon Way;~~ ~~b. Sufficient and suitable compensatory provsion has been made for the loss of wildlife in order to result in a net gain in biodiversity;~~ ~~c. Development proposals are resilient and resistant to flooding from tidl and surface water sources, and provide safe, on site refuge facilities in the event that a flood does occur;~~ ~~d. Sustainable drainage measures will be implemented to ensure no increase in the risk of surface water flooding to the site or nearby properties; and~~ ~~e. Drainage capacity will be improved as necessary to accommodate additional foul water flows.~~ ~~3~~2. Land to South of Northwick Road, the site will be delivered in accordance with extant consents to supply at least 14,537sqm of B Class industrial floorspace, 928sqm of E(g) Class business use floorspace, other commercial premises with a floorspace of up to 2,890sqm, and a hotel. ~~Made available for employment development falling within the B Use Classes of the Use Class Order where it can be demonstrated that:~~ ~~a. An enterprise centre or similar facility will be delivered on this site, providing accommodation for start-up businesses;~~ ~~b. Development proposals will ensure that there is no adverse harm to the Canvey Wick SSSI, and that any biodiversity loss on site is fully mitigated or compensated for, with the result in an environmental net gain;~~ ~~c. Development proposals are resilient and resistant to flooding from tidal and surface water sources, and provide safe, on site refuge facilities in the event that a flodd does occur;~~ ~~d. Sustainable drainage measures will be implemented to ensure no increase in the risk of surface water flooding to the site or nearby properties;~~ e. ~~Drainage capacity will be improved as necessary to accommodate additional foul water flows; and~~ ~~f. Development proposals are designed to reflect the prominent location of the site as the gateway to West Canvey.~~

Ref	Page	Policy/ Paragraph	Main Modification
MM39	77	Policy EC3	1. The Council will prepare a Master Plan for the Canvey Seafront Entertainment area. The Plan will set out a clear vision and objectives for the area, translating those into realistic investment plans to provide new entertainment facilities, improvements to the public realm and protection of key features such as the beach areas and historic assets. 2. Within the allocated seafront entertainment area, as shown on the Policies Map, commercial and leisure development proposals that can be demonstrated to ~~that~~ support the tourist industry will be permitted, subject to compliance with all other relevant policies. ~~Proposals for development falling within Use Classes A3, A4, A5 and D2 of the Use Classes Order at ground floor level will be supported. Additionally, proposals for development falling within Use Class A1 of the Uses Classed Order will be supported where:~~ ~~a.The proposed Use Class A1 floorspace is less than 100m2 in size; and~~ ~~b. The purpose of the Use Class A1 floorspace is to sell comparison goods associated with seaside / tourist activities.~~ 3. Where appropriate a project level HRA may be required alongside the consideration of the proposal, as per the requirements set out in policy SD1.
MM40	78	Paragraph 11.37	*INSERT A NEW PARAGRAPH AFTER PARAGRAPH 11.37 AND RENUMBER ALL PARAGRAPHS THEREAFTER ACCORDINGLY* The South East Inshore Marine Plan is also relevant in respect of any changes to the port facilities on Canvey Island, as consideration needs to be given on how any such changes impact on the marine environment or its use, including any conflicts arising with other users. Separate consents from the Marine Management Organisation will be required for certain types of activity. Along with the Vision for the Tidal Thames, the South East Inshore Marine Plan seeks to increase the use of port facilities in the Thames Estuary, where appropriate, in order to boost jobs and boost the movement of freight by water as a sustainable alternative to road transport. The port facilities on Canvey Island have a role to play in this vision.
	78	Paragraph 11.39	Ships access these facilities via the Thames Estuary. There are numerous ~~European designated~~ Habitats sites (SPA and SAC) ~~of nature conservation interest~~ designated in and around the Thames Estuary that may be affected by ~~direct and non-direct disturbance from~~ shipping activity. In accordance with the ~~Habitat Directive~~ Conservation of Habitats and Species Regulations 2017 (as amended), it will be necessary for ~~the significant~~ any adverse effects on the integrity of these protected sites arising from new port activities, including shipping access, to be ~~minimised~~ avoided.
	79	Paragraph 11.42	*INSERT A NEW PARAGRAPH AFTER PARAGRAPH 11.42 AND RENUMBER ALL PARAGRAPHS THEREAFTER ACCORDINGLY* The policy seeks to address issues arising from both the continuation of the existing operations and future proposals for the re-use of the site. For the avoidance of doubt, in the application of Policy EC4, Part 1 should be applied to those proposals which concern the continued use of the sites for the purposes for which they were operated at the date of the adoption of the Local Plan and where the hazardous material(s) listed on the hazardous substances consent is not changing. At some point in the future however, it is possible that the existing uses may no longer be required and the opportunity to use the sites for a different purpose, not associated with the storage of hazardous materials, or to use the sites for the storage of different types of hazardous materials for which hazardous substance consent was required and was not extant at the date of the adoption of the Plan, may present themselves. Such proposals would be considered under Part 2 of the Policy.
	79	Policy EC4	1. Existing operations ~~Applications for development at~~ ~~w~~Within the allocated Port Related Facilities Area shown on the Policies Map, applications for development at existing facilities in connection with the existing operations of the site as of the date of adoption of this Plan will be permitted, provided that they are compliant with, ~~at the existing port facilities at South Canvey will be permitted subject to compliance with~~ Policy NE7 and the following criteria: a. There must be no unacceptable change ~~increase~~ in the level of hazard or risk posed by the facility as a consequence of the proposals. The advice of the Health and Safety Executive will be sought in relation to this matter; b. The design of the proposed development must not cause significant harm to the landscape, having regard to the scale of existing development on the site; c. Public access to the coastal path adjacent to the site must be retained; ~~and~~ d. ~~The future operation of the site will not result in adverse impacts on water quality in the Thames Estuary, or have a significant adverse effect on protected nature conservation sites.~~ Where appropriate a project level HRA may be required alongside the consideration of the proposal, as per the requirements set out in policy SD1. In addition to this and where appropriate, proposals will be required to deliver a biodiversity net gain; and e. The design of the proposed development will incorporate measures to manage current and future flood risk, ensuring development is appropriately resilient and resistant to all sources of flood risk, including careful consideration of emergency planning procedures and areas of refuge for site users. 2. Proposed operations Applications for the change of use, a change in the type of materials handled, or for redevelopment of the existing port facilities at South Canvey will be permitted subject to compliance with Policy NE7 and the following criteria: a. Where the proposal includes a change of materials handled, and those materials are classified as hazardous, ~~I~~it can be demonstrated that the proposal is in the national interest;

Ref	Page	Policy/ Paragraph	Main Modification
			b. ~~The level of hazard and risk posed by the site is no greater than existing levels. The advice of the Health and Safety Executive will be sought in relation to this matter;~~ . There must be no unacceptable change in the level of hazard or risk posed by the facility as a consequence of the proposals. The advice of the Health and Safety Executive will be sought in relation to this matter; c. The design of the proposed development must not cause significant harm to the landscape, having regard to the scale of existing development on the site; d. Public access to the coastal path adjacent to the site must be retained; ~~and~~ e. Where appropriate a project level HRA may be required alongside the consideration of the proposal, as per the requirements set out in policy SD1. In addition to this and where appropriate, proposals will be required to deliver a biodiversity net gain; ~~The future operation of the site will not result in adverse impacts on water quality in the Thames Estuary, or have significant adverse effects on protected nature conservation sites.~~; and f. The design of the proposed development will incorporate measures to manage current and future flood risk, ensuring development is appropriately resilient and resistant to all sources of flood risk, including careful consideration of emergency planning procedures and areas of refuge for site users. 3. In the event that a proposal in relation to port facilities on Canvey Island is of a sufficient size to be considered a Nationally Significant Infrastructure Project for determination by the ~~Planning Inspectorate~~ Secretary of State, the Council will consider its response in accordance with the requirements of this ~~policy~~ Development Plan. 4. Any new development within the consultation zones identified by the Health and Safety Executive around the Hazardous Installation sites shall be considered within the context of Policy NE9 of this Plan.
MM41	81	Paragraph 12.3	The *NPPF* is clear that retail and other forms of town centre commercial developments should be located according to a sequential test and out of centre locations should only be considered if suitable sites in the town centre are not available, or not expected to become available, within a reasonable period. If a proposal cannot be located within a town centre, the impact of locating a proposal outside of a town centre must be assessed against and must not have an adverse impact on town centre vitality and viability.
	82	Paragraph 12.13	*ADD A NEW PARAGRAPH AFTER 12.13 AND RENUMBER SUBSEQUENT PARAGRAPHS ACCORDINGLY* In seeking to encourage a broader food and drink offer, it is important that we create a healthy food environment in our town centres and local communities. The national *Obesity Strategy* highlights that eating out can contribute towards obesity through the consumption of more calories. Takeaways and promotions in food stores can also add to the number of calories consumed. This is significant in Castle Point where obesity levels are higher than the national average. It is therefore necessary to ensure that the mix of uses, and the way in which buildings and spaces in town centres are designed promote active lifestyles and a healthy food environment. Health Impact Assessments are a useful tool in ensuring that the wellbeing of the community is considered as part of the design process, and will be required to ensure that proposals for development selling foodstuffs contribute to the creation of a healthy food environment.
	83	Policy TC1 Part 2	2. Within ~~Development within Use Classes A1 to A5 must be provided within~~ the Primary Shopping Frontages, listed below, only development proposals falling within Use Classes E and F, and compatible sui generis uses which are assessed to have a similar impact on amenity and on town centre vitality as a development in Use Class E will be permitted. The requirements of policy NE7 will be used to determine amenity impact. Active frontages must be maintained at the ground floor of these premises: Canvey Town Centre: 14-64 Furtherwick Road 68-90 ~~94~~ Furtherwick Road 3-59 Furtherwick Road Units 1-16 Knightswick Centre, Furtherwick Road Sainsbury, Knightswick Centre Hadleigh Town Centre: 207-253 London Road, Hadleigh 255-319 London Road, Hadleigh 2-28 Rectory Road 1-7 Rectory Road South Benfleet Town Centre: 261-311 High Road Tarpots Town Centre: 109-145 London Road, Benfleet 120-140 London Road, Benfleet
	83	Policy TC1 Part 4	4. Applications for ~~retail~~ development falling within Use Class E will normally be permitted in town centres. Outside of the town centres new ~~retail~~ development ~~and related uses~~ falling within Use Class E will be permitted if the following criteria can be met:…
	83	Policy TC1 Part 4a	a. A sequential test has been applied, and it has been robustly demonstrated that the proposed development cannot reasonably be accommodated within a town centre or local shopping parade, or as a second preference within an existing out of centre shopping area ~~or~~;…
	83	Policy TC1 Part 4	*INSERT A NEW POLICY REQUIREMENT AFTER PART 4* 5. Where an application is for a development intended for the sale of foodstuff, or could be used for such purpose, a health impact assessment will be required. Where this shows that the development has the potential to impact on health outcomes, measures should be included within the proposal to mitigate harm and create a healthy food environment.

Ref	Page	Policy/ Paragraph	Main Modification
MM42	85	Policy TC2 Part 3	3. Hadleigh Town Centre will be regenerated with the aim of providing an enhanced retail supply alongside a mix of other business, community/cultural, residential and open space uses~~.~~ ~~I~~in order to create a pleasant town centre that is attractive to residents, retail businesses, and makes the best use of land~~, the vision set out in the Hadleigh Town Centre Master Plan will be taken into account as material consideration in considering development proposals~~.
MM43	86	Paragraph 12.24	*ADD A NEW PARAGRAPH AFTER 12.24 AND RENUMBER SUBSEQUENT PARAGRAPHS THEREAFTER* For those reasons set out for policy TC1, a health impact assessment will be required for proposals which involve the sale of foodstuffs in local shopping parades. These parades are at the heart of local communities and have the potential to contribute to the exposure of residents to healthy food environments which will impact on their wellbeing.
	87	Policy TC3 Part 2	2. Proposals ~~Uses~~ for uses falling within Use ~~Classes A1, A2, A5 and D1~~ Class E of the Use Classes Order will normally be permitted at ground floor level within local shopping parades, subject to compliance with all other relevant policies in this plan.
	87	Policy TC3 Part 3	*INSERT A NEW POLICY REQUIREMENT AFTER PART 3* 4. Where an application is for a development intended for the sale of foodstuff, or could be used for such purpose, a health impact assessment will be required. Where this shows that the development has the potential to impact on health outcomes, measures should be included within the proposal to mitigate harm and create a healthy food environment.
MM44	87	Paragraph 12.28	The *South Essex Retail Study 2017* states that convenience shopping within Castle Point currently supports a local population. New convenience floorspace in addition to current provision should only be permitted when there is a mismatch between population and level of convenience floorspace as a result of new development. However, as set out in Policy TC1, new retail development should be focussed in the town centres. The Council acknowledges that both the Stadium Way and Canvey Retail Parks play a crucial role in meeting the retail needs of the Borough. They provide employment and support a supply chain network. Some of the premises at Stadium Way are now old and many converted from previous commercial uses and therefore, it is likely that redevelopment will need to take place. Where these redevelopments do occur, the Council will seek applications for the sale of foodstuffs to be accompanied by health impact assessments in order to ensure the creation of healthy food environments which support the wellbeing of local residents and other users.
	88	Policy TC4	1. There are two out of centre shopping areas in Castle Point, as identified on the Policies Map, at: Stadium Way, Thundersley; and Canvey Retail Park, Northwick Road, Canvey Island 2. Re-development for uses falling within Use ~~Classes A and D~~ Classes E and F of the Use Classes Order, and compatible sui generis uses which are assessed to have a similar impact on amenity and neighbouring developments as a development in Use Class E, assessed in accordance with policy NE7, will be permitted within these out of centre shopping areas where both sequential and impact assessments have indicated that it is appropriate to do so, and all other relevant policies in this plan have been complied with. An impact assessment will be required for proposals of 1,500 sqm or greater, consistent with the requirements of policy TC1. 3. Where an application is for a development intended for the sale of foodstuff, or could be used for such purpose, a health impact assessment will be required. Where this shows that the development has the potential to impact on health outcomes, measures should be included within the proposal to mitigate harm and create a healthy food environment.
MM45	88	Paragraph 12.31	There are a small number of units that continue to operate as shops within this area. There is the potential that these may be brought forward as restaurants or bars over time. It would be important for any such development to complement the existing range of uses, given the reasonable quality of provision that has been achieved already. In bringing forward such proposals, the Council will seek to ensure a healthy food environment and will expect applications to be accompanied by a health impact assessment.
	89	Policy TC5	1. South Benfleet Leisure Quarter is identified on the Policies Map and comprises the following properties: 1-7 (odd numbers) Essex Way 8-10 (even numbers) Essex Way 1-27 (odd numbers) High Street, South Benfleet 24-42 (even numbers) High Street, South Benfleet 2. Within this area, development proposals for~~uses falling within Use Classes A3 and A4 of the Use Classes Order~~ cafes, restaurants and bars will be supported~~.~~, subject to compliance with other relevant policies on design, the historic environment, flood risk and residential amenity being fully addressed. 3. Where an application is for a development intended for the sale of foodstuff, or could be used for such purpose, a health impact assessment will be required. Where this shows that the development has the potential to impact on health outcomes, measures should be included within the proposal to mitigate harm and create a healthy food environment
MM46	89	Paragraph 12.35	Hot food takeaways are now a common feature of town centres, high streets, and local centres because they fulfil an increasing demand for instant food access and convenience. Traditionally, hot food takeaways (~~A5~~ sui generis use class) differ in purpose from restaurants or cafés (~~A3~~ use class E(b)), however, some businesses classified as restaurants ~~(A3 use class)~~ also offer takeaway services…. *INSERT A NEW PARAGRAPH AFTER 12.35 MOVED FROM 12.38. RENUMBER SUBSEQUENT PARAGRAPHS THEREAFTER* Whilst local shopping parades are a sustainable location for hot food takeaways because they are close to where people live, in some instances the number of takeaways in such parades dominates over use class E(a) shopping provision, reducing the diversity of retail available.
	89	Paragraph 12.37	England has one of the highest rates of obesity in Europe and in the developed world. A Public Health England report *Adult Obesity (2018)* acknowledges obesity is one of the most widespread threats to health and well-being in the

Ref	Page	Policy/ Paragraph	Main Modification
			country and that there is a link between excess body weight and diseases such as type 2 diabetes, cancer and heart disease. This impacts on the cost of health care provision and the ability of health services to support local communities.
	90	Paragraph 12.38	~~Whilst local shopping parades are a sustainable location for hot food takeaways because they are close to where people live, there are, in some instances where the number of takeaways in such parades dominates over A1 shopping provision, reducing the diversity of local retail available.~~
	90	Paragraph 12.39	~~Furthermore, hot food takeaways can contribute towards unhealthy lifestyles, which in turn impact on the cost of health care provision and the ability of health services to support local communities.~~ The *Castle Point and Rochford Locality Estates Strategy 2018* classified 27% of adults and 20.4% of children in Castle Point as obese with fewer people eating healthily, this puts Castle Point at a higher than average level of obesity. Obese children are more likely than children of a healthy weight to become an obese adult with associated health problems later in life. ~~Policies restricting children's access to takeaway shops can act to discourage unhealthy eating and seek to stop the rising levels of obesity in the borough.~~
	90	Paragraph 12.40	Therefore, the proliferation of hot food takeaway provision in Castle Point is not only affecting the diversity of retail offer in Castle Point, it is also contributing towards poor health amongst the resident population. There is therefore a clear basis for seeking to limit further increases in the provision of hot food takeaways in Castle Point. In particular, policies restricting children's access to takeaway shops can, amongst other measures, act to discourage unhealthy eating and seek to stop the rising levels of obesity in the borough.
	90	Policy TC6 Part 1	1. In order to ensure that excessive concentrations of particular types of food and drink uses are avoided, applications for hot food takeaways falling within sui generis ~~U~~ use ~~C~~ class ~~A5~~ will be supported where the following thresholds are not exceeded: a. Within a Town Centre~~s~~, no more than 10% of shop units comprise hot food takeaways;
	91	Policy TC6 Part 2	2. A Health Impact Assessment of the proposal should be undertaken, and the measures identified should be incorporated within the proposal to limit the impact of the proposal on obesity levels within the local community, taking into account the proximity to existing schools, colleges and youth centres. ~~New hot food takeaway shops will only be permitted when they fall outside 400 metres walking distance of gates of new and existing schools, colleges, and youth centres, unless the outlets are within town centres and accord with other policies within this plan~~
MM47	93	Paragraph 13.10	The Castle Point and Rochford Clinical Commissioning Group (CCG) undertook a *Locality Estates Strategy 2018,* at that time it was estimated that at least £48.5 million of capital investment will be required in Castle Point and Rochford over the next ten years. This would support ~~will ensure that the~~ infrastructure requirements to facilitate ~~is in place to enable~~ the delivery of modern and sustainable~~,~~ integrated care services ~~to the~~ for current and future populations. This may include~~s~~ the development of ~~Primary Care~~ Healthcare Hubs on Canvey Island and in Benfleet, Primary Care Spokes and Administrative Hubs. *CREATE NEW PARAGRAPH* All plans for new healthcare facilities and services are subject to appraisal, viability and business case processes. A healthcare infrastructure requirement list has been produced to support this plan and has been integrated into the Infrastructure Delivery Plan (IDP). This list will be subject to iteration, therefore ensuring that requirements are current and align to existing and future strategies for the delivery of health and care services within Castle Point. NHS estates matters are dealt with through the Mid and South Essex STP estates team. A Forum has been established to consider the implications of planned growth to make the best use of the existing NHS estate. Essex County Council (ECC) has the role as a public health advisor. The Director of Public Health is the lead advisor for public health and planning matters. *RENUMBER ALL PARAGRAPHS THEREAFTER ACCORDINGLY*
	95	Policy HS1 Part 1a i	Ensuring access to high quality open spaces including the coast, and opportunities to engage in sport and recreation; and
	95	Policy HS1 Part 1c i	Working with NHS England, the Clinical Commissioning Group, ~~Basildon and Southend University Hospitals~~ Mid and South Essex University Hospitals Group and other providers of healthcare services in the Borough to ensure those organisations have the built facilities they need to deliver their service plans; and
	95	Policy HS1 Part 1d	d. Ensure new development is designed and located to promote good health, and avoid sources of harm to health by: i. Requiring good quality design in new developments, including design which ~~incorporates~~ has regard to Sport England's 'aActive dDesign' principles; and ii. Avoiding development in locations which may cause harm to human health by way of disturbance to the quality of life or pollution having reference to the criteria and requirements of policy NE7.
	96	Policy HS1 Part 2e	e. To ensure new development is designed to promote good health, Health Impact Assessments should be undertaken for all developments involving the sale of foodstuff, and for other developments of over 50 residential units or 1,000 sqm of non-residential development. Mitigation against negative health impacts and opportunities of positive health impacts should be identified. Negative health impacts identified in a Health Impact Assessment must be resolved in the development or secured through a Section 106 Agreement.
MM48	96	Paragraph 13.25	The *Castle Point ~~Playing Pitch Strategy~~ Built Facilities Strategy ~~(PPS)~~ Assessment Report 2018* found that the majority of sports assessed have sufficient facilities in the borough or nearby to support current need, although to improve and preserve participation levels most venues are encouraged to enhance or maintain existing facilities. It is essential that Castle Point provides a variety of different sporting activities to suit all abilities and ages. Furthermore, the *Built Facilities Strategy* concludes that key public sports halls and swimming pools are operating close to capacity and may therefore struggle to accommodate the additional demand generated by growth in this plan. There is therefore a need to enhance or provide new facilities to address any growth in demand. The *Built Facilities Strategy* recommends the use of developer contributions calculated using the Sport England Facilities Calculator to fund needs arising from growth. ~~The assessment found that there is a need to provide additional third generation turf pitches (3G) in the borough, this will help enhance current participation levels as well as reducing strain on current facilities.~~
	96	Paragraph 13.26	It should be noted that indoor physical recreation is not limited to provision within purpose-built leisure centres and gymnasiums. Exercise classes are regularly provided in community halls and school halls across the borough and

Ref	Page	Policy/ Paragraph	Main Modification
			contribute towards the variety of opportunities for residents to take part in physical activity. The *Built Facilities Strategy* recommends the use of community use agreements to secure access for the community to school halls and other such places where indoor activities can take place outside operational hours.
	97	Policy HS2	1. In order to increase participation in physical activity, the Council will seek to secure the following for indoor leisure and sports: a. The retention, and increased access for the public to existing indoor leisure and sports facilities; b. The use of a wider range of facilities for physical activity; c. A community hall with capacity for sports including badminton and short-mat bowls in the Benfleet, Hadleigh and Thundersley area. 2. This will be achieved by: a. Protecting existing indoor sports provision from re-development for other uses as required by Strategic Policy HS6; ~~b. Working with schools and other owners of indoor sport facilities to increase community access to these facilities during non-school hours, through the use of community use agreements.~~ ~~c. Encouraging the use of multi-functional community halls and school halls for the purpose of increasing sports participation within local communities~~ b. Community use agreements will be required where appropriate where a multi-functional community hall, school/college hall or stand-alone indoor sports facility is provided or enhanced, to increase sports participation within local communities and community access to these facilities; ~~d~~c. Where appropriate, developer contributions will be sought including the provision of land to enable the delivery of additional leisure and sport facilities; and ~~e~~d. Working with partners and the community to secure and deliver suitable facilities through the use of planning conditions and/or planning obligations; ~~f. Maximising opportunities to secure investment in the provision of these facilities.~~
MM49	98	Paragraph 13.30	Policy NE1 of this plan sets out requirements for the provision of Green and Blue Infrastructure in Castle Point. This policy seeks to deliver the ambitions of the *South Essex Green Grid Strategy, the South Essex Green and Blue Infrastructure Strategy, and the Essex Green Infrastructure Strategy* and the Greater Thames Marshes Nature Improvement Area through the provision of multi-function green infrastructure projects, which deliver a range of benefits including, recreational benefits for local people, including access to coast.
	98	Paragraph 13.33	*INSERT A NEW PARAGRAPH AFTER PARAGRAPH 13.33, AND RENUMBER ALL PARAGRAPHS THEREAFTER ACCORDINGLY* With regard to formal outdoor sports facilities, the *Castle Point Playing Pitch Strategy (2018) and Castle Point Playing Pitch Assessment (2018)* identified the need for some additional pitch provision in Castle Point to address both existing deficiencies and also the needs arising from growth. It also identified the need to improve the quality of some aspects of provision. The assessment specifically found that there is a need to provide additional third generation pitches (3G) in the borough, this will help enhance current participation levels as well as reducing strain on current facilities. The outcomes of the *Playing Pitch Strategy* are reflected in the IDP. In order to deliver improvements in provision, the use of community use agreements is advocated to secure access to those outdoor sports facilities located in schools. The Council will use Sport England's Playing Pitch Calculator to secure funding for any new facilities required to support growth.
	98	Paragraph 13.34	This plan ~~also~~ provides an opportunity for the Council to aim to increase the amount of open spaces within the Borough in order to address current deficiencies in the range and accessibility of open space provision in Castle Point. There should be additional provision made for: • Outdoor sports pitches and facilities as recommended by the Playing Pitch Strategy; • Additional parks and gardens, (potentially provided within existing amenity green spaces); • Additional natural green space to be provided in Thundersley; • Additional children's play spaces should be provided in several locations throughout the Borough; and • Civic spaces such as civic squares and market places to be secured through the regeneration of Hadleigh and Canvey Town Centres.
	99	Policy HS3 Part 1	1. Public access will be secured to open space in order to support active and healthy communities and to manage recreational pressures on areas of nature conservation interest. This will be achieved by working with partners to deliver open space and green infrastructure projects in the Borough. This will be supplemented by additional provision secured on development sites. The Council will have regard to its residential Design Standards, the Essex Design Guide and the Playing Pitch Assessment and Strategy in assessing the appropriate open space requirements within new development.
	99	Policy HS3 Part 2	2. In order to ensure that there is good access to a variety of open space opportunities within Castle Point, additional provision will be sought as set out in the Castle Point Borough ~~Infrastructure Delivery Plan~~ IDP. Where appropriate developers will be expected to contribute toward this provision as set out in the IDP. This includes: a. One 3G pitch on Canvey Island and two 3G pitches in the Benfleet, Hadleigh and Thundersley area; b. Additional parks and gardens throughout the borough; c. Additional accessible natural green space throughout the borough;

Ref	Page	Policy/ Paragraph	Main Modification
			d. Additional Multi Use Games Areas (MUGAs); e. New and improved ancillary features such as car parking, changing rooms, storage facilities, and floodlighting ~~(where appropriate) and car parking;~~ in appropriate locations where they will not give rise to unacceptable impacts on residential amenity; f. Additional children's play spaces in West Canvey, East Canvey, Central Thundersley and Daws Heath; ~~g. Outdoor bowls provision on Canvey;~~ g~~h~~. Improvements to tennis court provision; h~~i~~. Improvements to hard-court provision; and i~~j~~. Improved playing pitch provision, including the creation of additional pitches in less flood prone locations and 3G pitches.
	100	Policy HS3 Part 3	3. In order to improve the quality of open spaces in Castle Point, and the ability of residents to be able to enjoy them to their fullest potential, the following improvements to the open space network will be sought as part of the open space provision on development sites in appropriate locations, and by working with partners: a. Improved links within and between open spaces; b. Improved accessibility for all users to open spaces and the coast; c. Improved facilities within open spaces; ~~and~~ d. Improved biodiversity within open spaces; and~~.~~ e. Improvements that deliver climate change mitigation and resilience. *ADD THE FOLLOWING NEW CRITERIA BELOW AFTER PART 3* 4. Where appropriate a project level HRA may be required alongside the consideration of the proposal, as per the requirements set out in policy SD1.
MM50	100	Paragraph 13.39	For the purpose of this policy, education facilities include, but are not limited to: early years and childcare (~~nurseries, pre-schools, children's centres~~ full day care, pre-schools, child minders, school run early years provision, and 'wrap around care' – breakfast, after school and holiday clubs), schools (primary, secondary and ~~sixth form~~ Post 16 Education), young people with special educational needs and disabilities, colleges, libraries, youth facilities, employment and skills measures and other community learning spaces.
	103	Policy HS4 Part 2	2. Where a development proposal, ~~by virtue of its scale and/or location~~ either individually or cumulatively with other development, will increase demand for education facilities beyond those available within the local area, new or enhanced facilities will be sought through a Section 106 Agreement, as per by policy SD2.
MM51	104	Paragraph 13.64	The ~~CCG, working with Local Authorities and local stakeholders, addresses Primary Care capacity issues in the area as part of the wider Estates Strategy for~~ Mid & South Essex Sustainability & Transformation Partnership (STP) has indicated that they will seek to deliver capacity improvements to meet existing and future needs within its area through improvements to existing facilities where possible. There may also be a requirement for additional infrastructure to accommodate new models of care as set out within the NHS Long-Term Plan (2019). New homes will increase pressure on existing provision, creating additional demand for healthcare services. As appropriate, new development proposals will therefore be asked for contributions towards the provision of healthcare facilities. The Mid and South Essex STP has also indicated development locations where new facilities may be required. These requirements are identified in the relevant allocation policies and IDP.
	105	Policy HS5 Title	Health and Social Care Provision ~~Facilities~~
	105	Policy HS5 Part 2	2. Where ~~the cumulative impacts of residential~~ a development proposal ~~within a local area~~, either individually or cumulatively with other development, will increase demand for ~~education~~ healthcare and social care facilities beyond those available within the local area, ~~development will be required to make proportionate~~ contributions towards new or enhanced facilities will be sought through a Section 106 Agreement, as per by policy SD2. ~~to support capacity improvements to health and social care infrastructure~~. Where specified in the relevant allocation policy, some development proposals will also be required to make land available for new health care facilities.
MM52	106	Paragraph 13.75	For the purposes of this Policy, community facilities can be found in the Policies Map and are listed in appendix eight, this includes education facilities, sports and leisure facilities, libraries, non-residential health and social care facilities, cultural facilities, community centres, and places of worship.
	106	Policy HS6 Part 1	1. In order to allow communities to meet their day to day needs, proposals for new, extensions, alterations or redevelopment of existing community facilities, as shown on the Policies Map and listed at Appendix Eight, or change of use to another facility will be supported where it can be demonstrated that the development will:
	107	Policy HS6 Parts 1e to 1f	e. Provide greater community benefits; ~~and~~ f. Bring about broader benefits to provide alternative community use, if there is an identified surplus of the existing community service; and ~~.~~ *INSERT A NEW CRITERION AFTER PART 1f OF POLICY HS6* g. Where appropriate a project level HRA may be required alongside the consideration of the proposal, as per the requirements set out in policy SD1.
	107	Policy HS6 Part 2b	b. The loss will be replaced by equivalent or better provision in terms of quantity and quality in accordance with the requirements of part 1 of this policy. Where appropriate a Section 106 Agreement will be used to secure the replacement provision, as per policy SD2.

<table>
<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td>MM53</td><td>108</td><td>Paragraph 13.81</td><td>INSERT A NEW PARAGRAPH AFTER PARAGRAPH 13.81, AND RENUMBER PARAGRAPHS THEREAFTER

With regard to sports pitches meanwhile, the Castle Point Playing Pitch Assessment and Strategy (2018) highlighted deficits in relation to several types of sports pitches, especially in relation to football. Therefore, it is imperative that in order to meet current and future needs that existing pitches are not lost, except in circumstances where equivalent or enhanced provision is secured nearby.</td></tr>
<tr><td></td><td>108</td><td>Policy HS7</td><td>REORDER AND AMEND POLICY HS7

~~1. The locations of existing open spaces, allotment gardens and playing fields associated with educational uses are identified on the Policies Map, and a schedule of these sites can be found in Appendix Three.~~

~~2.~~ 1. Limited minor scale ancillary development on open spaces, allotment gardens and playing fields associated with educational uses will be permitted, where it can be demonstrated that:

a. The development will increase opportunity for public recreational use or improve the recreational quality of the space;

b. The overall use of the space is retained for recreational purposes;

~~d~~ c. The reduction in open space will not have an unacceptable impact on the character of the area;

~~c.~~d. The development will not impact on the ability of the open space to provide other environmental services and benefits, including but not limited to, biodiversity, flood storage and the accommodation of future flood defence works; and

~~d.~~ e. Where appropriate a project level HRA may be required alongside the consideration of the proposal, as per the requirements set out in policy SD1.~~The loss of the open space will not have a detrimental impact on the character of the area.~~

~~3~~ 2. ~~Any d~~ Developments resulting in a loss of any existing or newly created publicly available open space; allotment garden; or playing field associated with educational uses will only be supported where:

a. An assessment has been undertaken which indicates that the existing facility is surplus to requirements; or

b. The loss will be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. Where appropriate, a Section 106 Agreement will be used to secure the replacement provision~~.~~; or

c. The development is for alternative sports or recreation provision, the benefits of which clearly outweigh the loss of the current or former use.

~~1.~~ 3. The locations of existing open spaces, allotment gardens and playing fields associated with educational uses are identified on the Policies Map, and a schedule of these sites can be found in Appendix Three.</td></tr>
<tr><td>MM54</td><td>112</td><td>Policy TP1 Part 3</td><td>INSERT AS A NEW PART 3

3. Where appropriate a project level HRA may be required alongside the consideration of the proposal, as per the requirements set out in policy SD1.</td></tr>
<tr><td>MM55</td><td>113</td><td>Paragraphs 14.13 and 14.14; Table 14.1 and 14.2</td><td>DELETE PARAGRAPHS 14.13 AND 14.14 AND TABLES 14.1 AND 14.2 AND REPLACE WITH THE FOLLOWING PARAGRAPHS. NUMBER PARAGRAPHS AND SUBSEQUENT PARAGRAPHS THEREAFTER

~~14.13 Due to the physical constraints on the highway network in the Borough, new infrastructure provision to the transport network is fundamental to delivering a wider choice of sustainable transport modes. Through the Essex Local Transport Plan, and ongoing engagement with the Highways Authority and local residents, a number of highways schemes have been identified to provide improvements to the highways network within the Borough. The scheme listed in the table below are at early stages of progression, and do not currently have identified funding mechanisms in place to support their implementation. Further details on these schemes is available within the Castle Point Infrastructure Delivery Plan.~~

~~Table 14.1: Strategic Highways improvements~~

<table>
<tr><th>~~Project~~</th><th>~~Location~~</th><th>~~Reason for improvement~~</th><th>~~Proposed improvements~~</th></tr>
<tr><td>~~Extension to Roscommon Way (Phase 3)~~</td><td>~~Canvey Island~~</td><td>~~East-west movements are currently restricted to Somnes Avenue and Long Road. As a result, these routes become particularly congested at peak~~</td><td>~~Extension to Roscommon Way from Haven Road to Western Esplanade to provide an alternative east-west route on the island, alleviating~~</td></tr>
</table>
</td></tr>
</table>

Ref	Page	Policy/ Paragraph	Main Modification				
						~~times, especially Long Road which services a large number of side streets. There is a need for an increased capacity of east-west routes across the island.~~ ~~Roscommon Way is elevated above projected flood water depths and designed to cope with a 1 in 100-year event. The majority of existing roads on Canvey Island are not built with the capability to withstand a severe flooding event.~~	~~congestion on Long Road and Somnes Avenue.~~ ~~The extension to Roscommon Way would be elevated above projected flood water depths and designed to cope with a 1 in 100-year event. This will provide additional capacity for emergency evacuation access for the island during a severe flooding event.~~
				~~New access for Canvey Island~~	~~Canvey Island~~	~~Access for Canvey Island is from Canvey Road and the A130 Canvey Way. Both accesses join the island at the B1014 / Canvey Road roundabout in the north eastern corner of the island. The limited access for the island results in significant congestion on these routes at peak times, and safety concerns regarding emergency access for the island for instance where the B1014 / Canvey Road roundabout and associated existing access points are inaccessible.~~ ~~Oikos is a nationally important refined petroleum facility located in the south eastern corner of the island. Existing limited access from the island, particularly in an emergency situation where existing access points could be compromised, is a significant concern for the distribution of refined petroleum in the UK.~~ ~~Access to employment opportunities west of Canvey Island for residents on the island, particularly at the DP World London Gateway port in Thurrock, is currently poor, requiring residents to travel north to the A13 on a looped 15-mile journey.~~	~~Construction of a third access for Canvey Island, from Northwick Road, crossing Holehaven Creek, to the Manorway A1014 on the mainland.~~ ~~This would provide access for the island from an alternative route which does not rely on the B1014 / Canvey Way roundabout. This would provide alternative emergency access and would also open up access to employment opportunities to the west for Canvey Island residents.~~
				~~Improved access to Canvey Island~~	~~Canvey Island~~	~~Congestion and queueing on access routes to Canvey Island, in particular on Canvey Way and Somnes Avenue.~~	~~The widening of Somnes Avenue to provide two lanes between Waterside roundabout and Elsinor Avenue roundabout.~~ ~~Provide 'KEEP CLEAR' marking across junction of Long Road / Hawkesbury Road.~~ ~~Provide traffic signals at the junction of Long Road / Thorney Bay Road.~~ ~~Instigate school travel plans / safer journeys to school intervention to discourage trips to school by car at Canvey Junior School, Canvey Island Infant School, William Read Primary School and Castle View School.~~
				~~A127 corridor for growth and route management strategy~~	~~Northern edge of the Borough~~	~~The A127, which passes along the Borough's northern boundary, is a strategic route in South Essex which becomes congested during peak periods. Congestion is experienced at key junctions along its route. Junctions which experience problems include the Fairglen Interchange and the Rayleigh Weir, both located in Castle Point Borough. The capacity of the A127 is expected to be exceeded as a result of growth across South Essex, including key employment growth at Southend Airport and in the Basildon Enterprise Corridor.~~	~~A strategy has been prepared by Essex County Council to address congestion issues for the A127 Corridor. This strategy includes substantive upgrades to the Fairglen Interchange.~~ ~~Short term Fairglen Interchange improvements are proposed for construction in 2020, and include:~~ ~~• A new road linking the A130 to the A1245;~~ ~~• Widening of slip roads on the Fairglen Roundabout;~~

Ref	Page	Policy/ Paragraph	Main Modification

			~~• Additional and longer slip lanes off the A127;~~ ~~• Traffic lights at Rayleigh Spur Roundabout and an additional lane; and~~ ~~• A new pedestrian and cycle bridge on the A127.~~ ~~Consideration of future improvements to the A127 is being managed by the A127 Task Force and its relationship to the location of future growth within the Borough.~~
~~A129 Route Improvements~~	~~Thundersley~~	~~Significant congestion on the A129 between the A13 / A129 junction and the A129 / A127 Rayleigh Weir junction.~~	~~Essex County Council are currently assessing potential improvement options on this route. No specific projects have been identified at this stage.~~
~~Canvey Way / A13 slip road~~	~~Sadlers Farm Roundabout, westbound (in Basildon Borough)~~	~~Concern that the slip road from Canvey Way to the A13 is too short, creating safety concerns and reducing the flow of traffic to the A13 from Canvey Island.~~	~~No proposals identified. Essex County Council are currently considering improvement options.~~

~~14.14 In addition to the schemes identified in Table 14.1, *Transport Evidence for the New Local Plan 2019 has* identifies the need for additional improvements to the highway network in order to accommodate growth as outlined in the table 14.2 below:~~

~~Table 14.2: Highway Improvements from Growth~~

~~Project~~	~~Location~~	~~Issue and proposed improvements~~
~~New roundabout on the A130~~	~~Benfleet, around 900m south of the Sadlers Farm junction on the A130.~~	~~Provide access to site HO9, land west of Benfleet, while maintaining traffic flows on the A130.~~
~~Dualling of around 900m of the northern section of the A130 Canvey Way~~	~~Benfleet, between the proposed new roundabout (see above) and the Sadlers Farm junction.~~	~~To reduce congestion and improve traffic flows on the A130. To provide the opportunity for improved traffic management leading to the Sadlers Farm junction. While the project is in Benfleet, it will provide significant benefits for vehicles from Canvey Island accessing the Sadlers Farm junction.~~
~~Route improvements on the A129~~	~~Thundersley, A129 route between Rayleigh Weir junction and the Victoria House Corner junction.~~	~~Congestion at all junctions on the A129 and significant congestion at the Woodmans Arms junction currently occurs. Congestion levels will be increased by growth proposed close to the A129 on sites HO13, HO20, and HO21.~~ ~~Options for improvements include undertaking further work with Essex County Council to identify appropriate solutions on the A129 route.~~
~~Victoria House Corner junction improvements~~	~~Hadleigh, A13 / A129 junction~~	~~To improve traffic flows as a result of growth proposed in the Local Plan. Mitigation works identified within the *Transport Evidence Mitigation and Sensitivity report 2019*.~~
~~Somnes Avenue / Link Road junction improvements~~	~~Canvey Island, on the B1014~~	~~To improve traffic flows as a result of growth proposed in the Local Plan. Mitigation works identified within the *Transport Evidence Mitigation and Sensitivity report 2019*.~~
~~B1014 High Street / B1014 Essex Way / B1006 High Road junction assessment~~	~~Benfleet, near Benfleet train station~~	~~To reduce congestion and improve traffic flows as a result of growth proposed in the Local Plan. Mitigation works identified within the *Transport Evidence Mitigation and Sensitivity report 2019*.~~
~~Junction improvements at Kenneth Road~~	~~Benfleet, Kenneth Road / A13 junction~~	~~To improve traffic flows as a result of growth proposed in the Local Plan. Mitigation works identified within the *Transport Evidence Mitigation and Sensitivity report 2019*.~~
~~New roundabout access from Canvey Road to site HO23, land east of Canvey Road~~	~~Canvey Island, Canvey Road~~	~~To provide access to site HO23.~~

Ref	Page	Policy/ Paragraph	Main Modification

~~Pegasus crossing on Roscommon Way~~	~~Canvey Island, Roscommon Way~~	~~To support equestrian uses in the area and provide improved access to the West Canvey Marshes RSPB site for new and existing local residents.~~
~~Additional public transport provision~~	~~Borough-wide~~	~~New / extended bus services to accommodate new housing development.~~

Due to the physical constraints on the local and strategic highway network in the Borough, new infrastructure provision to the transport network is fundamental, including the provision of a wider choice of sustainable and active travel modes. Through the Essex Local Transport Plan and ongoing engagement in the preparation of the plan with the Highways Authority, site promoters and local residents, a number of schemes have been identified to provide improvements to the transport network by all modes within the Borough. In addition to its Bus Strategy ECC has launched the `Safer Greener Healthier' campaign which seeks to make it as easy as possible for Essex residents to travel more sustainably, especially for shorter journeys by walking, cycling, e-scootering or taking the bus or train for longer journeys. Its vision seeks to create a road environment that is safer, especially for shorter journeys; deliver sustainable transport solutions to support the reduction in carbon emissions and deliver long-term greener benefits, including long term public health benefits.

The A127 forms part of the Strategic Road network and its importance in Essex, South Essex and Castle Point is set out in the "A127 A Corridor for Growth - an Economic Plan" 2014, through a transport route management strategy. The A127 presently experiences challenges regarding capacity and peak hour congestion. There is a need to manage traffic along the A127 to improve air quality; improve safety and network resilience and provide congestion relief. A cross authority A127 Task Force including ECC, South Essex Authorities and the London Borough of Havering has been established to co-ordinate transport requirements within the A127 corridor. Transport improvements along the A127 Corridor will be made having regard to the A127 A Corridor For Growth: An Economic Plan.

A number of transport improvements, including highway alterations and modal shift initiatives, have been identified through various studies undertaken during the preparation of the Local Plan. Some of these schemes are outlined in the Infrastructure Delivery Plan (IDP), which identifies the infrastructure needed to support development, its phasing and estimated costs. Within the schemes identified, some have differing funding sources and will come forward in different ways including the following:

- Schemes required as a result of growth in the borough. These highway alterations and modal shift initiatives are a direct result of growth and will be funded and delivered through appropriate highway works and developer contributions.
- Schemes that are expected to come forward during the plan period but are not directly linked to planned growth. Where development increases the need for such improvements the Council will seek a proportionate developer contribution from relevant schemes. Additional funding will be sought through other sources, as appropriate, including for example relevant Government bodies and funding streams, ECC, the South East Local Enterprise Partnership and ASELA.
- Schemes that are long held aspirations for the Council but the exact nature of the improvements and funding for them are presently unknown, such as improved access to Canvey Island. This is expressed in greater detail in policy TP3.

Where appropriate a project level Habitats Regulations Assessment (HRA) may be required alongside the consideration of any proposal that seeks improvements or alterations to the highway network as per the requirements set out in policy SD1.

117	Policy TP2	*REPLACE POLICY TP2 IN ITS ENTIRETY WITH THE FOLLOWING TEXT*

~~1. In order to manage congestion on key routes, and at key junctions within the borough and improve the quality of town centre environments, the following improvements and alterations to carriageway infrastructure in Castle Point will be delivered:~~

~~a. A127 Growth Corridor Strategy;~~

b. ~~Highway improvements in Canvey and Hadleigh Town Centres.~~

~~2. In order to manage congestion on key routes, and at key junctions within the borough and improve the quality of town centre environments, the following improvements and alterations to carriageway infrastructure in Castle Point will be delivered through contributions set out in the Infrastructure Delivery Plan and safeguarding areas are shown on the policies map:~~

~~a. Extension to Roscommon Way Phase 3;~~

~~b. Widening of Somnes Avenue;~~

~~c. Route improvements along the A129 Rayleigh Road between the Rayleigh Weir and Victoria House Corner junctions;~~

~~d. Dualling of the northern section of the A130 Canvey Way in the vicinity of Sadlers Farm; and~~

~~e. Minor Junction improvements at both ends of Kenneth Road.~~

Local Policy TP2
Improvements and Alterations to ~~Carriageway~~ Highway Infrastructure

1. The Council will seek to manage congestion on key routes and improve network resilience through the design and delivery of the projects identified within this policy, implementation of active and sustainable transport measures, improving the quality of town centre environments, namely Canvey and Hadleigh and other improvements identified through the master planning and planning application process.

2. Transport improvements along the A127 Corridor will be made having regard to the A127 A Corridor For Growth: An Economic Plan.

3. To deliver the local plan growth, the following highway and transportation infrastructure improvements will be required:

Ref	Page	Policy/ Paragraph	Main Modification
			a. New roundabout access from the A130 to site HO9 b. Additional highway capacity including improvements to the northern section of the A130 Canvey Way and improvements to A13 slip road c. Route improvements on the A129 transport corridor including public transport and active travel d. Victoria House Corner junction improvements e. Somnes Avenue / Link Road junction improvements f. B1014 High Street / B1014 Essex Way / B1006 High Road junction improvements g. Minor Junction improvements at Kenneth Road especially at the junction with the A13 h. New roundabout access from Canvey Road to site HO23 i. Pegasus crossing on Roscommon Way linking HO23 to West Canvey Marshes j. Pedestrian and cycle access to Benfleet railway station k. Provision of new and enhanced public transport services and infrastructure 4. Where necessary, the Council will secure highway works (S278) and/or financial contributions (S106) to deliver highway projects necessary to accommodate the growth arising from this plan. 5. The Council will consider the impact of development proposals on the land needed to deliver the highway projects listed within this policy, and where necessary refuse applications for development which would prevent or significantly affect the delivery of those highway projects. 6. All proposals should provide active and sustainable transport measures and comply with other relevant policies in the plan which secure high environmental quality and compliance with relevant environmental legislation. 7. Any improvements or alterations to the highway network may require a project level HRA, where appropriate, as per the requirements set out in policy SD1.
MM56	117	Policy TP2	*INSERT NEW REASONED JUSTIFICATION AND POLICY AFTER POLICY TP2, NUMBER THE BELOW AND SUBSEQUENT PARAGRAPHS AS APPROPRIATE* New and Improved Access to Canvey Island Reasoned Justification The Council is committed to securing better access to Canvey Island for its 40,000 plus residents. In addition to its large resident population, the Island has two top tier Control of Major Accident Hazards (COMAH) sites at ports of national importance to fuel supply; is at risk from tidal flooding although substantially defended in this regard; and at risk from localised flooding due to its topography. Improved access to Canvey Island would assist in relieving peak hour congestion at key access points and improve the resilience of the highway network for the Island's residents and businesses, particularly in the case of an emergency. Currently, access to and from the Island is via two routes. The principal access to and from the Island is via the A130 Canvey Way, which is a purpose-built access road that is elevated in parts. It comprises a single lane in each direction and converges with the B1014 from South Benfleet at the Waterside Farm junction. This junction experiences congestion and delay at peak hours. The northern extent of Canvey Way is the Sadlers Farm junction of the A13 with the A130, which also experiences congestion and delay at peak hours because of pinch points on various arms of the Sadlers Farm junction, including on Canvey Way. A second route is via the B1014 Canvey Road, which passes by Benfleet Railway station (the nearest station to Canvey Island) and through the historic core of South Benfleet. There are presently no plans to improve highway capacity on this route, which whilst being a Priority 1 route, also performs as a local and residential route in places. On the Island traffic is distributed from the Waterside Farm junction, east-west via two main routes – Somnes Avenue and Canvey Road/Long Road. Both routes experience peak time congestion, with delays on Canvey Road/Long Road exacerbated due to the number of access and egress points along its route including residential side roads, schools and other developments. Congestion can impact on the efficiency of public transport services as well as private vehicles. There is the potential to promote modal shift through active travel measures by improving the attractiveness for cycling in the vicinity, and such locations will continue to be considered in the future for cycle corridor upgrades. Journey time delays are experienced on the A130 Canvey Way, at the Waterside Farm junction, along Somnes Avenue and Canvey Road/Long Road. There are also delays in the morning peak through South Benfleet along the B1014 meaning this route does not provide an attractive alternative to traffic seeking to access or leave the island. Improvements are necessary to address the delays presently experienced by the existing population and to provide improved highway network resilience. The Access to Canvey Study (2017) sought to identify potential options to improve highway and multimodal access and egress to Canvey Island along with improvements to other traffic flows. In addition, to seeking to improve east-west movements along Somnes Avenue and Canvey Road/Long Road, it is an aspiration to bring forward the final section of the extension to Roscommon Way which extends the route from Haven Road to Thorney Bay Road. The completion of Roscommon Way would provide alternative routes to Long Road and Somnes Avenue during peak congestion, and provide an alternative route for residents and visitors on or near the seafront areas to access or egress the island, who at present have little choice but to use Long Road. The Council is committed to working with key stakeholders in preparing an access to Canvey feasibility study that looks at the potential highway and sustainable mode options for improved access to and from the Island, but also within the island to improve traffic flows and sustainable transport on Somnes Avenue and Long Road. To improve capacity on these two routes, including capacity for sustainable modes, it is vital that additional capacity on the island is provided. Roscommon Way Phase Three could be a key component in this regard.

Ref	Page	Policy/ Paragraph	Main Modification
			Due to the location of the Benfleet and Southend Marshes SPA and Ramsar site and the Thames Estuary and Marshes SPA and Ramsar site in relation to Canvey Island the Habitats Regulation Assessment process will be followed for this policy. *INSERT NEW POLICY TP3 AND RENUMBER SUBSEQUENT POLICIES THEREAFTER* Strategic Policy TP3 New and Improved Access to Canvey Island 1. The Council will undertake a feasibility study to identify options for improving access to and from and within Canvey Island, including consideration of any wider strategic implications on and off the Island. 2. This will be prepared in collaboration with key partners including ECC, adjoining district and unitary Council's, Transport East, Government Departments such as the DfT and DLUHC and relevant agencies as well as engagement with the local community. 3. The recommendations from the feasibility study will inform the first review of the Local Plan. 4. Options in the feasibility study for improvements to access to Canvey Island will be subject to Habitats Regulations Assessment.
MM57	119	Heading – Local Policy TP3 Improvements to Footpaths, Bridleways and Cycling Infrastructure	*REPLACE ALL POLICY TP3 REFERENCES WITH THE FOLLOWING HEADING* Local Policy TP4~~3~~ Improvements to ~~Footpaths, Bridleways and Cycling~~ Active Travel Infrastructure
	118	Paragraph 14.18	The *NPPF* also encourages the pursuit of planning policies which enable and support healthy lifestyles, for example the provision of safe and accessible green infrastructure. This includes bridle paths in Castle Point. *The South Essex Green and Blue Infrastructure Strategy* details how access to the Green and Blue infrastructure supports the wellbeing of residents and communities in South Essex, including Castle Point and sets out how accessibility to Green and Blue Infrastructure should be improved.
	119	Paragraph 14.24	The *Canvey Town Centre Masterplan 2010* emphasises the potential to enhance cycling access to Canvey Town centre through the provision of cycling infrastructure. In addition to these specific projects, ~~Essex County Council~~ ECC has reviewed the cycle network within Castle Point in the *Castle Point Borough Cycling Action Plan 2018~~7~~* to identify gaps in the network, the need for route improvements and the need for additional ancillary infrastructure such as cycle parking and crossing facilities. A key project to support modal shift, and multi-modal journeys is improvements for pedestrian and cycle access to and around Benfleet railway station.
	119	Paragraph 14.25	The *South Essex Green and Blue Infrastructure Strategy* identifies a network of Public Rights of Way across South Essex, including Castle Point, which provide access to residents to the countryside and open space. These are important for wellbeing but were identified as being fragmented in parts and needing improvements. The Council will work in conjunction with partners in this strategy particularly in relation to cross boundary projects. As part of this PROW network ~~T~~there is a network of bridle paths in Castle Point, which supports the recreational pursuit of horse riding from numerous stables located in the borough. It is important to recognise the value of this network and seek improvements where appropriate.
	119	Policy TP3 Part c	c. Improvements to local footpaths, bridleways and cycling networks across Castle Point linking to the Thames Estuary Path, and any other appropriate green infrastructure links, addressing gaps in the network and ensuring all routes are attractive and well-designed ~~of a high quality~~;
	119	Policy TP3 Part d	d. Provision and enhancement of cycling infrastructure, ~~in accordance with~~ having regard to the latest ~~Essex County Council~~ ECC Cycling Strategy and local action plans for delivery, including cycle parking facilities and crossings, at public transport nodes, especially Benfleet railway station, and other appropriate destinations, including town centres, employment areas, schools and other publicly accessible buildings, within Castle Point.
	120	Policy TP3 Part d	*ADD THE FOLLOWING NEW CRITERIA BELOW AFTER PART 3* Where appropriate a project level HRA may be required alongside the consideration of the proposal, as per the requirements set out in policy SD1.
MM58	120	Paragraph 14.32	*INSERT A NEW PARAGRAPH AFTER PARAGRAPH 14.32, AND RENUMBER ALL PARAGRAPHS THEREAFTER ACCORDINGLY* As is the case across the UK, the rail services out of Benfleet railway station are operated under a private contract, and the *Essex Local Transport Plan* does not therefore set out detailed requirements in relation to rail provision. These improvements are separately secured via the Franchise Agreement. Trenitalia c2c Limited have a franchise to operate services on the line between London Fenchurch Street and Southend until 2029. As part of the franchise agreement Trenitalia c2c Limited committed to leasing new trains to cope with rising passenger numbers, and to various upgrades around stations and ticketing. Regarding Benfleet railway station, improvements are to be delivered in respect of the booking hall, external access and in creating a secure station information area.
	121	Policy TP4	Strategic Policy TP4~~4~~5 Improvements to Public Transport Infrastructure Services *NUMBER THE FIRST SECTION OF POLICY TP4 PART 1 AND AMEND TEXT.* 1. In order to improve journey time reliability for public transport, and make services more favourable to residents and employees in Castle Point, the following improvements to public transport infrastructure and services will be delivered through the implementation of the Infrastructure Delivery Plan. Grant funding, Community Infrastructure Levy, and as appropriate in planning terms S106 Agreements will be used to secure this delivery. ~~, by Section 106 Agreements from appropriate development, Community Infrastructure Levy or grant funding.~~ … *INSERT PART 2 TO THE POLICY*

Ref	Page	Policy/ Paragraph	Main Modification
			2. The Council will also work with Trenitalia c2c Limited and other relevant partners to secure the necessary improvements to Benfleet railway station and rail services as set out in the Franchise Agreement.
MM59	121	Paragraph 14.35	The Essex ~~Local Transport Plan~~ Development Management Policies (2011) set out a clear approach to congestion at policy DM15. This requires there to be no detrimental impact upon the existing or proposed highway in ~~increase to~~ congestion terms as a result of new development. Any detrimental impact is required to be remedied through appropriate mitigation funded by the developer.
	121	Paragraph 14.36	~~Essex County Council~~ ECC ~~have~~ has published ~~established a suite of~~ ~~d~~Development ~~m~~Management P~~p~~olicies (2011), the Highways Technical Manual in the Essex Design Guide (2018) and the Developers' Guide to Infrastructure Contributions (2020) to which new development is required to have regard to when preparing development proposals. Developments above the identified thresholds in the Guide and Management Policies, or successor documents, are required to prepare a Travel Plan, Transport Assessment and/or Statement to assess the impact of their development in terms of highway safety and capacity for both access to the proposed development and the wider highway network. Travel Plans are required to be prepared to encourage modal shift through a package of measures to ensure active and sustainable means of travel are available to all new residents or users thereby promoting sustainable transport, reducing the need to travel, and encouraging the use of non-car modes. ~~which it considers as the Highway Authrity when consulted on planning applications. It is recommended that potential applicants for development within Castle Point have regard to these policies when preparing planning proposals.~~
	122	Paragraph 14.37	The Transport Evidence for the New Local Plan 2019 Report demonstrates that the highway ~~road~~ network in Castle Point already experiences congestion on key routes and at key junctions during peak periods. It is therefore necessary ~~essential~~ that the Council requires developers to identify ~~considers~~ the ~~likely~~ impacts of development on ~~the capacity of~~ highway infrastructure in terms of capacity and safety ~~and congestion~~ when assessing planning applications to ~~and~~ ensure~~s~~ that necessary mitigation measures are provided and funded ~~minimises these impacts as far as is reasonably possible~~.
	122	Policy TP5 Part 1	Strategic Policy TP~~5~~6 Highway Impact 1. Developers ~~All development~~ will be required to prepare ~~proposals that are likely to generate amounts of movements must be accompanied by~~ a Transport Assessment or Transport Statement, and a Travel Plan, having regard to the guidance on thresholds published by the Highway Authority. 2. The Transport ~~a~~Assessment ~~/~~ or S~~s~~tatement ~~and plan~~ must demonstrate how the impacts of the development on the highway network will be cost effectively mitigated to limit significant effects on highway and junction capacity and safety. 3. Subject to compliance with all other relevant policies, favourable consideration will be given to ~~those~~ development proposals which fully mitigate their impacts on highway and junction capacity and safety. Applications will be refused where: a. A development is not able to ~~fully~~ mitigate its impacts to an acceptable degree; and b. A junction or link of highway is expected to exceed its designed capacity ~~as a~~ resulting in ~~of~~ residual cumulative impacts which are assessed to be severe; or c. A junction or link of highway that already exceeds its ~~designated~~ designed capacity will see its peak hour capacity exceeded still further and as a result the residual cumulative impacts are severe. 4. Where necessary, ~~In appropriate circumstances~~, the Council will secure ~~use~~ planning conditions, ~~or~~ highway works (s278) and/or financial contributions (s106) ~~a Section 106 Agreement~~ to deliver ~~ensure that highway~~ mitigation works necessary ~~and/or Travel Plan requirements are delivered~~ to accommodate the growth arising from this plan ~~accompany the phasing of development.~~
MM60	123	Paragraph 14.43	With regard to the need for safe access arrangements to new developments, the *Essex Local Transport Plan* highlights the importance of ensuring that new developments can be accessed safely by all types of users including cars, bicycles and pedestrians in order to prevent road traffic accidents. The Essex Design Guide seeks to encourage active design in new developments through a range of measures including establishing walkable communities, connected walking and cycling routes, co-location of community facilities and establishing multi-functional spaces, all of which encourage the use of sustainable modes and promote healthier lifestyles.
	123	Paragraph 14.45	Typically, people are more likely to access public transport if it is located within a reasonable proximity of where they live and the places they are travelling to. Walking distances in excess of ~~ten~~ five minutes normally deter use. The average person can walk up to ~~800m~~ 400m in five ~~ten~~ minutes.
	123	Policy TP6	Strategic Policy TP~~6~~7 Safe and Sustainable Access
	124	Policy TP6 Part c	c. Access to public transport services within ~~800m~~ 400m of the site. Where this is not possible a contribution will be sought to improving access to existing public transport services or residential travel packs.
MM61	125	Policy TP7	Strategic Policy TP~~7~~8 Parking Provision
	125	Policy TP7 Part 1	1. Proposals for development will be expected to make provision for safe and secure car parking, parking for people with disabilities and parking for bicycles, having regard to the Essex Vehicle Parking Standards. Maximum car parking standards will only be applied where there are compelling planning and transport reasons to justify such restrictions. Proposals which make parking provision below these standards should be supported by evidence detailing the local circumstances that justify deviation from the standard.
MM62	126	Policy TP8	Strategic Policy TP~~7~~8 Access for Servicing
MM63	129	Policy CM1 Part 2	*DELETE PART 2 OF THE POLICY* ~~2. When assessing proposals for new development the Council will seek to ensure that adequate provision has been made to accommodate new communications infrastructure on site. This must include:~~

Ref	Page	Policy/ Paragraph	Main Modification
			~~a. The extension of broadband fibre optic cable to the serve the development with "fibre to the door" broadband services; or~~ ~~b. The provision of cabinets in suitable locations to provide superfast broadband connectivity speeds to all properties within the new development; and~~ ~~c. Where appropriate, the provision of telecommunications equipment to ensure 5G mobile phone coverage across the site.~~
MM64	131	Paragraph 16.10	The Urban Design Characterisation Study 2013 of the Borough identifies the urban areas ~~it~~ as being dominated by residential development, with a mix of detached, semi-detached and terraced houses, chalets and bungalows, interspersed with two, three and four storey blocks of flats, creating a mixed character across the borough as a whole.
	132	Paragraph 16.17	The Castle Point Residential Design Guidance Supplementary Planning Document (SPD) identifies how the following policies in this chapter will be implemented. Further guidance on a broad range of design matters can also be found in ~~T~~the Essex Design Guide, which supports the delivery of high-quality development that meets the needs of existing and future communities in Essex. A Quality design Panel has been established, with panellists drawn from a range of built environment professions to and provide an independent view on development schemes across Essex and how they may be improved. The Council will support reference to the panel in order to provide a critique of development or make recommendations that improve quality.
	132	Policy DS1	1. Within urban areas ~~T~~the Council will seek to improve the quality and attractiveness of the environment in Castle Point, and its integration with the natural environment, by ~~seeking~~ expecting buildings and places to be of high quality, beautiful and sustainable design that accentuates positive features of the urban environment and contributes positively towards climate change mitigation ~~sustainability~~. 2. The Council will seek a co-ordinated comprehensive approach to public realm enhancements for the borough, particularly within its town centres and employment areas. Development will need to demonstrate how it will contribute to the quality of the public realm. 3. The Council will seek to promote healthy and active lifestyles through design of the built environment. In order to achieve this the Council will work with partners to deliver regeneration and public realm improvements in Canvey and Hadleigh Town Centres. and public realm improvements which includes: a. Street furniture; b. Landscaping, including soft landscaping; c. Infrastructure and services; d. Palette of materials (structures and surfaces); and e. Public art 4. All development should to be designed to a high standard, meeting the design objectives set out at Appendix One, and fully integrating sustainability requirements. Development proposals must be appropriate to the site and its surroundings having regard to: a. Scale b. Density c. Massing d. Height e. Landscape f. Layout g. Materials h. Detailing i. Access j. Security and crime prevention measures k. Flood resilience and drainage l. Adjoining land uses 5. The Council will ~~H~~have regard to the Residential Design Guidance SPD and the Essex Design Guide in its consideration of all proposals for residential development. 6. Proposals for development within the Green Belt will be determined against the provisions of Policies GB1, GB2 and GB3.
MM65	134	Policy DS2 Part 1	1. Where appropriate development must provide hard and/or soft landscaping, appropriate to and suitable for the location and type of development provided. Trees should form a key element of the landscaping of development, with existing trees retained wherever possible and new streets should be tree lined. The approach to landscaping should be ~~As~~ set out in a landscaping scheme.
	134	Policy DS2 Part 2b-2c	b. Native species, suitable to the location, climatic conditions, and to promoting biodiversity, and be appropriate in respect of growth habits; ~~and~~ c. SuDS if required to form an integral part of the landscaping scheme providing opportunities for a variety of habitats, species and biodiversity; and *INSERT NEW CRITERION AFTER PART 2C* d. To contribute towards tackling climate change.
MM66	135	Policy DS3	Where advertisement consent is required, such consent will be permitted if the proposal respects the interests of public safety and amenity, ~~and meets~~ by meeting the following criteria: a. The size, design, materials and location of the advertisement respects the scale and character of the building, site or area on which it is displayed; b. The proposals would not result in proliferation of advertisements; c. Any illumination ~~will be considered in relation to~~ respects the impact on visual amenity, potential light pollution, ~~road safety,~~ character of the area and buildings and functional need; and

Ref	Page	Policy/ Paragraph	Main Modification
			d. The~~y do~~ Proposal does not have an adverse effect on highway safety.
MM67	141	Paragraph 17.15	Re-alignment of Green Belt boundaries at the following school sites would therefore meet their national and local objectives: • King John School, Benfleet; • The Deanes School, Benfleet; • Glenwood School, Benfleet; • Kents Hill Infants and Junior School, Benfleet; • Holy Family Catholic Primary School, Benfleet; • Robert Drake Primary School, Benfleet; • Canvey Skills Campus~~ / Procat~~, Canvey Island; and • Cornelius Vermuyden, Canvey Island.
	141	Paragraph 17.18	As a result of the changes made in this plan, ~~nearly~~ over 92~~0~~% of the Green Belt extent identified in the 1998 Castle Point Adopted Local Plan is retained. By retaining this extent of Green Belt it will continue to serve its purpose of keeping land permanently open and maintaining a clear visual separation between the individual towns within Castle Point and within South Essex whilst enabling sustainable development to meet the needs of the community to 2033.
	142	Paragraph 17.19	The Green Belt extent, as set out in this plan, is defined on the Policies Map and is over 2,500~~400~~ hectares.
	142	Policy GB1	*REPLACE GB1 IN ITS ENTIRETY WITH THE FOLLOWING TEXT* ~~1. The Council will continue to protect the permanence and openness of land designated as Green Belt. Development within the Green Belt will only be permitted in very special circumstances or if it is not inappropriate development.~~ ~~2. Development that is not inappropriate in the Green Belt, as defined in the National Planning Policy Framework will be subject to consideration against policies within this plan.~~ ~~3. Opportunities that enhance the environmental quality and beneficial use of the Green Belt will be supported by the Council, in particular the provision of formal and informal green infrastructure to support the quality of life of the urban population (provided that it is appropriate development as defined in the National Planning Policy Framework).~~ The Council will determine proposals within the Green Belt in accordance with all relevant provisions of the National Planning Policy Framework and relevant policies within this plan. The Green Belt boundary is defined on the Policies Map.
MM68	142 - 153	Paragraphs 17.21 17.22-17.24; 17.32-17.38; 17.39-17.46; 17.55-17.62	*REPLACE THE REASONED JUSTIFICATION AND TITLE FOR POLICY GB2 WITH THE FOLLOWING AND DELETE THE REASONED JUSTIFICATION FOR POLICIES GB3, GB5, GB6 AND GB8* ~~17.21 The *Green Belt Review* considered carefully the extent of the Green Belt boundary, and the contribution different parts of the Green Belt make to its overall function. Therefore, it is likely that development within the defined extent of the Green Belt will cause harm to the Green Belt either in terms of its openness or its function. The Review provides advice to decision makers on the potential for a development to impact on openness and landscape character, and the likely impact on Green Belt functions.~~ ~~Extensions and Alterations to, and Replacements of Buildings in the Green Belt~~ ~~Policy Context~~ ~~17.22 The *NPPF* states that new buildings are inappropriate in Green Belt. Exceptions to this include:~~ ~~• Extensions and alterations of buildings provided that they do not result in disproportionate additions over and above the size of the original building. (Original building is defined in the NPPF as being a building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally.)~~ ~~• Replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces.~~ ~~Reasoned Justification~~ ~~17.23 Both individually and collectively extensions and alterations to buildings, and the replacement of buildings in the Green Belt can have an impact on the character, appearance and openness of the Green Belt. It is important therefore that such development is well designed in respect of the host building, the plot, and its surroundings. This is particularly important given the differing patterns of development that are found in the Green Belt in the borough, such as built up frontages of development, and more isolated, single plot development.~~ ~~17.24 Appeal decisions, locally and nationally in relation to development in the Green Belt indicates general support in cases where the visual impact in terms of design and massing, the reduction in separation, the loss of isolation spaces between properties and boundaries, and the change in character of a development, such as replacing a single storey, development with a two storey development, were significant. However, developments have been allowed at appeal where the harm has been outweighed by other factors such as design considerations, which result in positive benefits to the Green Belt, including new pitched roofs on top of existing flat roofs or development contained within the existing building footprint.~~ ~~Change of Use of Buildings and Land in the Green Belt~~ ~~Policy Context~~ ~~17.32 The *NPPF* states that certain forms of development are not inappropriate in Green Belt, provided they preserve its openness and do not conflict with the purpose of including land within it. This includes the re-use of buildings provided that the buildings are of permanent and substantial construction and material changes of use of land.~~

Ref	Page	Policy/ Paragraph	Main Modification
			~~17.33 Some development, may be associated with other appropriate uses of land in the Green Belt such as agriculture, forestry, outdoor sport, outdoor recreation, cemeteries, burial grounds and allotments if any buildings preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.~~ ~~Reasoned Justification~~ ~~17.34 The *Green Belt Review* identifies much of the Green Belt in Castle Point as being rural in nature. Rural areas are typically quiet, with a low development density and low intensity uses.~~ ~~17.35 The re-use or adaption of existing buildings or land in the Green Belt, particularly in respect of commercial, light industrial or recreation uses can aid in reducing the demands for new buildings in the Green Belt.~~ ~~17.36 In order for the re-use of an existing building or land to be compatible with the essential characteristics of the Green Belt, which is its openness and permanence, and with the purposes of including it within the Green Belt, such a re-use must be of a scale and character appropriate to its Green Belt location, its traffic impact should be acceptable, and the building concerned should be of an appropriate structure for the proposed use, in order to avoid substantial redevelopment, such as extensions or alterations.~~ ~~17.37 This can be a problem when the re-use is for residential purposes, where there are pressures to extend and alter the property and to provide residential curtilages which can be associated with activities and structures which can have a harmful effect on the character, appearance and openness of the Green Belt. Furthermore, given the tightly drawn Green Belt boundary of the borough, properties, particularly residential, are in immediate proximity of the Green Belt. The local planning authority can be placed under pressure to allow extensions of gardens into the Green Belt, which if permitted can result in a use of the land, which is not characteristic of the Green Belt, and which can lead to a proliferation of domestic style structures to the detriment of the openness of the Green Belt.~~ ~~17.38 Uses which are associated with external storage can also result in harm to the character, appearance and openness of the Green Belt. The borough has historically experienced the storage of materials and equipment, as well as caravans and boats in its Green Belt, particularly in its more rural and remote locations. This is not a use which it would seek to continue or encourage in the future.~~ ~~Ancillary Buildings and Structures in the Green Belt~~ ~~17.39 Many forms of development often have ancillary buildings associated with them. For example it is common for houses to have garages, sheds and greenhouses located within the curtilage of the house. Business premises meanwhile may have ancillary storage buildings. In many cases the provision of these buildings is permitted under 'permitted development rights' and the Council is not able to control their development.~~ ~~17.40 It is however common for the Council to remove 'permitted development rights' when granting consent for developments within the Green Belt. Additionally, some proposals may be for ancillary buildings too large to be exempt from requiring planning consent, or for ancillary buildings located on land beyond the curtilage of a house. Therefore, it is not uncommon for the Council to receive planning applications for ancillary buildings and structures in the Green Belt.~~ ~~Policy Context~~ ~~17.41 The *NPPF* does not make specific reference to ancillary buildings, however it does list those types of development and uses of development that are exceptionally permitted within the Green Belt. Assuming that those types and uses of development are permissible, it can be assumed that ancillary buildings which are normally associated with these are permissible subject to ensuring that the openness of the Green Belt is maintained and that the Green Belt continues to fulfil its purposes, as set out in the *NPPF*.~~ ~~Reasoned Justification~~ ~~17.42 The provision of buildings and structures described above to serve an acceptable use in the Green Belt, such as a stable for the keeping of horses and hay and tack store to serve the stables, or a building to store equipment or goods related to a commercial business, can be acceptable in principle in the Green Belt. However, the open character and appearance of the Green Belt can be marred by such buildings and structures, both in respect of their design and appearance, and their proliferation.~~ ~~17.43 The borough's Green Belt is occupied by a variety of uses and is susceptible to pressures to allow for the provision of such buildings and structures. If designed and sited appropriately they can result in forms of development which may not be inappropriate in the Green Belt.~~ ~~17.44 However, there are examples of poorly designed and located ancillary buildings and structures which result in harm to the Green Belt. In some parts of the Green Belt a proliferation of caravans and metal storage containers has occurred in association with the storage of hay and tack associated with the stabling of horses and other livestock, as well as for example the storage of materials and equipment in association with other recreational or commercial uses in the Green Belt. In many cases there are multiples of these buildings and structures located at any one site creating a massing effect. This is not an occurrence that the local planning authority wishes to see continue or to be encouraged.~~ ~~17.45 Previously policy has not taken account of the size of the building/structure in relation to the main building on the site or the size of the site itself. The degree to which these buildings/structures are incidental to the main building or use is therefore of great importance. A proportionate approach addresses this issue. As an example, a large house with extensive grounds will require more extensive maintenance. It would therefore be logical that such properties may require a larger outbuilding to accommodate gardening equipment, such as a motorised lawn mower and larger tools specific to works on trees and hedges.~~ ~~17.46 As with other forms of permissible development in the Green Belt, ancillary buildings are most appropriately considered against criteria, as this best ensures that proportionality, design requirements and the impacts of the proposal of the Green Belt, its openness and its purpose are considered in the whole.~~ ~~Enclosure and Boundary Treatment in the Green Belt~~ ~~Policy Context~~ ~~17.55 The *NPPF* states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development and creates better places in which to live and work.~~ ~~17.56 The *NPPF* makes clear that planning policies and decisions should aim to ensure that developments:~~

Ref	Page	Policy/ Paragraph	Main Modification
			~~• Add to the overall quality of the area, are visually attractive as a result of good architecture;~~ ~~• Establish a strong sense of place, using the arrangements of streets, spaces, and building types;~~ ~~• Respond to local character and history, and reflect the identity of local surroundings, and building types;~~ ~~• Respond to local character and history, and reflect the identity of local surroundings and materials; and~~ ~~• Create places that are safe, inclusive and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.~~ ~~17.57 The *NPPF* states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, and the essential characteristics of Green Belts are their openness and their permanence.~~ ~~Reasoned Justification~~ ~~17.58 Clearly identifying the extent of ownership of space around a building defines the boundary between public, semi-private and private spaces. This is frequently through the construction of means of enclosure, which are readily visible in the public realm.~~ ~~17.59 Within the Green Belt of Castle Point the various land uses, such as residential, small holdings, and commercial businesses, have a mix of forms of enclosures, with the properties often set back considerable distances from the highway.~~ ~~17.60 The *Urban Design Characterisation Study 2013* identified that many of the commercial/industrial uses, as well as the small holdings are strongly enclosed by high fencing and palisade fencing, with electronic gates, frequently of stark materials. This creates a poor public realm and has resulted in a sense of isolation and remoteness, which can lead to the perception of not being safe.~~ ~~17.61 The residential properties in the Green Belt are also heavily enclosed, often by similar forms as discussed above, particularly in the case of older properties. There is also high and dense hedging provided in many areas.~~ ~~17.62 There are also successful means of enclosure in some parts of the Green Belt, which whilst providing the necessary demarcation and security measures, are of attractive construction, appropriate to the land use they are associated with. Examples include the provision of ranch style fencing used to enclose land containing livestock, including horses. Such methods provide the necessary enclosure of the animals, but at the same time are of an appearance commonly associated with agriculture and maintain a degree of openness. Furthermore, the provision of decorative railings can provide the necessary security for businesses or residential properties, at the same time as creating an attractive public realm, allowing for natural surveillance to take place, and a degree of openness to be maintained.~~ Development in the Green Belt Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Substantial weight should be given to any harm to the Green Belt, and very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal is clearly outweighed by other considerations. The NPPF makes it clear that the construction of new buildings in the Green Belt should be regarded as inappropriate development, subject to certain exceptions. When considering the existence of very special circumstances or if one of the exceptions set out in the NPPF may apply, the Council will need to determine the harm to the Green Belt that may arise from the proposed development. The *Green Belt Review* carefully considered the extent of the Green Belt boundary, the purposes for including land within the Green Belt and the contribution different parts of the Green Belt made to its overall purpose. It concluded that all parts of the Green Belt in Castle Point contribute to at least one of the purposes of including land within its extent, and therefore it is likely that development in any part of the Green Belt could give rise to harm, either in terms of its openness or purpose. The Review provides advice to decision makers on the potential for development to impact on the openness and purpose of the different parts of the Green Belt and may provide a useful starting point when preparing proposals and considering the likely impacts of development. It notes that there is scope in the different parts of the Green Belt to avoid or reduce harm through the proposed location, layout, scale and design of development and uses, including any landscaping and boundary treatments. These matters will therefore be considered in the determination of applications. In those exceptional instances where development in the Green Belt is approved because the benefits of the proposals clearly outweighing the harm to the Green Belt or any other harm arising, the Council will consider if permitted development rights afforded to the type of development proposed would cause harm to the Green Belt to the extent that the benefits of the development would no longer be outweighed by the harm arising. Where there is a clear justification and the tests for conditions or obligations would be passed, the Council may seek to restrict permitted developments rights where a development proposal would not otherwise be acceptable in the Green Belt. In those instances where there is the potential for the use of permitted development rights to give rise to harm which outweighs the benefits of the proposal, the Council will use a S106 Agreement to remove the relevant permitted development rights. As developments in the Green Belt are exceptional rather than planned for, their full impact could not be assessed through the Habitats Regulations Assessment for this plan. Therefore, proposals for development in the Green Belt will need to demonstrate that they will not have an adverse effect on the integrity of the Benfleet and Southend Marshes SPA and Ramsar site and the Thames Estuary and Marshes SPA and Ramsar site, either alone or in combination with other plans or projects as per Policy SD1.
	143 - 154	Policies GB2; GB3; GB5; GB6; GB8	*REPLACE POLICY GB2 AND WITH THE FOLLOWING AND DELETE POLICIES GB3, GB5, GB6 AND GB8.* ~~Strategic Policy GB2~~ ~~New Development in the Green Belt~~ ~~Where new buildings or structures are proposed within the Green Belt, inappropriate development will be refused by reason of its harm to the Green Belt, except in very special circumstances. Consideration will be given to:~~

Ref	Page	Policy/ Paragraph	Main Modification
			~~a. The Green Belt of and in the vicinity of the proposal will continue to fulfil its purpose/s;~~ ~~b. The proposal is designed to integrate well into the landscape in which it is set and to maintain the openness of the Green Belt;~~ ~~c. The proposed development is an exemplar of high-quality design;~~ ~~d. Whether the land is previously developed, providing that the new building is within the envelop of the land previously developed and not the whole curtilage of the site; and~~ ~~e. The proposal is consistent with all other relevant policies of this plan.~~ ~~Strategic Policy GB3~~ ~~Extensions and Alterations to, and Replacements of Buildings in the Green Belt~~ ~~1. Proposed extensions and alterations to existing buildings in the Green Belt will be permitted, provided that the proposals do not result in disproportionate additions over and above the size of the original building(s), and also subject to fulfilling the following criteria:~~ ~~a. There is no material impact on the character, appearance or openness of the Green Belt;~~ ~~b. The individual and cumulative size, scale, form, massing and height is proportionate to that of the original building and its plot;~~ ~~c. The design and siting ensure sufficient space around the building, between neighbouring buildings and between boundaries;~~ ~~d. The design, siting and materials is sympathetic to the existing building and its surroundings; and~~ ~~e. The design and materials are of high quality.~~ ~~2. Proposals for replacement buildings in the Green Belt, will be permitted, provided that the new building is in the same use and not materially larger than the one it replaces, and subject to fulfilling the following criteria:~~ ~~a. The building to be replaced has not been abandoned for such a period that the site has developed greenfield characteristics;~~ ~~b. There is no material impact on the character, appearance or openness of the Green Belt;~~ ~~c. The individual and cumulative size, scale, form, massing and height reflects the original building and its plot;~~ ~~d. The design and siting ensure sufficient space around the building, between neighbouring buildings and between boundaries; and~~ ~~e. The design, siting and materials is sympathetic to the existing building and its surroundings, unless its re-siting and design would be less obtrusive in the Green Belt and would improve the appearance of the Green Belt.~~ ~~3. Where the replacement building is approved, a condition may be applied to any permission granted removing permitted development rights which might allow for further enlargements to the building, and/or the provision of ancillary buildings within the curtilage of the building, compromising the criteria set out above.~~ ~~Strategic Policy GB5~~ ~~Change of Use of Buildings and Land in the Green Belt~~ ~~1. Proposals for the change of use of buildings or land in the Green Belt will be permitted, subject to fulfilling the following criteria:~~ ~~a. The existing building is of permanent and substantial construction;~~ b. ~~The building or land is suitable for the proposed use, with limited need for extensions or alterations;~~ ~~c. There is no material impact on the character, appearance or openness of the Green Belt;~~ ~~d. It will not result in an intensification of the existing use of the site, by means of the generation of traffic, noise, or other forms of disturbance;~~ ~~e. It will not result in a massing of open storage, parked cars, plant or temporary, ancillary or out buildings/structures greater than existing; and~~ ~~f. The need for the proposed use has been identified.~~ ~~2. Permitted development rights relating to outbuildings will be removed if a garden has been extended into the Green Belt.~~ ~~Local Policy GB6~~ ~~Ancillary Buildings and Structures in the Green Belt~~ ~~1. The provision of ancillary buildings and structures in the Green Belt will not be permitted, unless it is proven to be necessary subject to fulfilling the following criteria:~~ a. ~~There is no material impact on the character, appearance or openness of the Green Belt;~~

Ref	Page	Policy/ Paragraph	Main Modification
			~~b. The individual and cumulative size, scale, form, massing and height is proportionate to that of the original building and its plot;~~ ~~c. It can be clearly demonstrated that they are incidental to the main building or use of the site;~~ d. ~~The use of the main building or use of the site has not been left dormant;~~ e. ~~The design and siting ensure sufficient space around the building, between neighbouring buildings and between boundaries;~~ f. ~~The design, siting and materials are sympathetic to the existing building or use and its surroundings. However, it must not repeat poor forms of development;~~ ~~g. The design and materials are of high quality; and~~ ~~h. It is restricted to use as ancillary accommodation to the main building or use.~~ ~~2. The use of caravans, mobile homes or metal storage containers as ancillary buildings in the Green Belt will normally be refused.~~ ~~Strategic Policy GB8~~ ~~Enclosure and Boundary Treatment in the Green Belt~~ ~~1. For land in the Green Belt, the means of enclosure or boundary treatment should be informed by the prevailing character of the land use, surrounding area, in terms of materials, height and positioning.~~ ~~2. Any means of enclosure or boundary treatment should not dominate the public realm.~~ ~~3. Enclosure and boundaries within rural areas should maintain a semi-openness of the Green Belt.~~ ~~4. In all cases the means of enclosure or boundary treatment must be of high-quality materials, appropriate in terms of appearance and ongoing maintenance to the location, full details of which must form part of any application.~~ ~~5. Where more robust means of enclosure or boundary treatment is required in exceptional circumstances, its visual impact should be minimised by the provision of appropriate landscaping. For landscaping associated with residential development, reference should be made to the Residential Design Guidance Supplementary Planning Document (SPD).~~ Strategic Policy GB2 Development in the Green Belt 1. In determining the harm to the Green Belt arising from development or any material change of use, the planning authority will give consideration to: a. The impact of the proposal on the ability of the Green Belt to fulfil its purpose(s); b. The ability of the proposal to maintain or improve the openness of the Green Belt; c. The impact of the proposal on the character and appearance of the Green Belt d. The design of the proposal, which will be expected to be an exemplar of high-quality; e. Whether the land is previously developed; f. Whether the proposal will result in an unacceptable intensification of traffic movements, noise or other forms of disturbance; and 2. Where appropriate a project level HRA may be required alongside the consideration of the proposal, as per the requirements set out in policy SD1. 3. Where there is a clear justification and the tests for conditions/obligations would be passed, the Council may seek to restrict permitted development rights where a proposal would not otherwise be acceptable in the Green Belt.
MM69	145	Paragraphs 17.25 – 17.31 and Policy GB4	*DELETE POLICY GB4 AND ITS REASONED JUSTIFICATION IN ITS ENTIRETY AND RENUMBER SUBSEQUENT PARAGRAPHS AND POLICIES ACCORDINGLY* ~~Limited Infill and Self Build - Special Policy Areas~~ ~~Policy Context~~ ~~17.25 The *NPPF* allows for limited infilling infill in the Green Belt in 'villages.' Furthermore, limited infill is allowed on previously developed land where there is no greater impact on the Green Belt than that arising from the existing or previous development.~~ ~~Reasoned Justification~~ ~~17.26 Green Belt runs through the central mainland area of the Borough, from the Hadleigh Marshes in the south to the A127 in the north, creating a strategically important physical gap between built up urban areas of the Borough. Green Belt in the north east of the Borough also has a strategically important role in maintaining Daws Heath as a separate and distinct settlement and maintaining a physical gap in the built form between the urban areas of Eastwood and Rayleigh outside the Borough, and the settlement of Hadleigh, Daws Heath, and Thundersley.~~

Ref	Page	Policy/ Paragraph	Main Modification
			~~17.27 These Green Belt areas are predominantly undeveloped and contribute significantly to the local character. The undeveloped areas of the Borough are also important for local flora and fauna and for recreational purposes.~~ ~~17.28 However, the Benfleet Road and Vicarage Hill, Bramble Road and Burches Road areas form semi-rural locations where limited infilling would not cause increased harm to the Green Belt. These areas consist of linear development, creating an almost continuous developed semi-rural character. While the Council supports the protection of Green Belt in these areas, it is acknowledged that due to the developed character and layout of existing buildings, the application of Green Belt policy in these areas is inappropriate and unnecessarily restrictive.~~ ~~17.29 While existing development runs alongside the road in these areas, the density of existing development is low, and existing houses are set back from the road and include large landscaped gardens. The extent of existing development in these areas do not necessitate a change to the Green Belt boundary, so it is appropriate to outline additional policy in order to more appropriately manage development within these particular areas of the Green Belt.~~ ~~17.30 Existing development within these areas is linear, and therefore has a limited impact on Green Belt areas to the rear of the properties beyond the roads. To maintain the openness of the Green Belt in these areas, the Council will therefore not support backland development. Development proposals in these areas should be in the form of limited infill, facing existing roads.~~ ~~17.31 The Council will support bespoke and self-build new dwellings in the Special Policy Areas where the proposed development responds appropriately to character and layout of existing development. The Council will also support extensions and alterations to existing dwellings in these areas where it can be demonstrated that the proposals will not have a significant detrimental impact on the openness of the Green Belt.~~ ~~Local Policy GB4~~ ~~Limited Infill - Special Policy Areas~~ ~~1. The development of new dwellings within the Bramble Road, Benfleet Road, Vicarage Hill, and Burches Road Special Policy Areas (identified on the Policies Map) will be supported where the proposals:~~ ~~a. Respect the existing character of the area;~~ ~~b. Are centrally located on the plot and along existing general building lines;~~ ~~c. Have plot sizes that should generally confirm with those in the area to avoid higher density development;~~ ~~d. Front onto existing roads;~~ ~~e. Maintain the existing layout and form of development in the area;~~ ~~f. Do not result in the significant loss of existing tree coverage;~~ ~~g. Do not involve back land development;~~ ~~h. Provide off street parking; and~~ ~~i. Demonstrate that the scheme will not have a significant detrimental impact on the openness of the Green Belt within the area.~~ ~~2. Extensions and alterations to existing dwellings within the Bramble Road, Benfleet Road, Vicarage Hill, and Burches Road Special Policy Areas (identified on the Policies Map) will be supported where the proposals:~~ ~~a. Respect the existing character of the area;~~ ~~b. Maintain the existing layout, massing, bulk and form of development in the area;~~ ~~c. Do not have a detrimental impact on neighbouring residential amenity; and~~ ~~d. Demonstrate that the scheme will not have a significant detrimental impact on the openness of the Green Belt within the area.~~ ~~3. Where the replacement building is approved, a condition may be applied to any permission granted removing permitted development rights which might allow for further enlargements to the building, and/or the provision of ancillary buildings within the curtilage of the building, compromising the criteria set out above.~~
MM70	153	Policy GB7	*REPLACE POLICY GB7 IN ITS ENTIRETY WITH THE FOLLOWING TEXT* ~~1. The Council will consider proposals favourably which seek to positively enhance the beneficial use of the Green Belt, by providing opportunities for positive use of the Green Belt. Where development is proposed adjacent to the Green Belt, opportunities will be sought to:~~ ~~a. improve access;~~ ~~b. outdoor sport and recreation;~~ ~~c. landscape enhancements;~~ ~~d. improvements to visual amenity;~~

Ref	Page	Policy/ Paragraph	Main Modification
			~~e. improvements to biodiversity;~~ ~~f. sustainable flood risk management; or~~ ~~g. improvements to damaged and derelict land.~~ ~~2. Such proposals must clearly demonstrate that the following criteria have been fulfilled:~~ ~~a. The Green Belt will continue to fulfil its purposes;~~ ~~b. There will be no material impact on the character, appearance or openness of the Green Belt;~~ ~~c. The design, siting and materials of any buildings are sympathetic to the surrounding built form and landscape;~~ ~~d. The proposal is an exemplar of high-quality design and materials;~~ ~~e. The design and siting of any buildings ensures sufficient space around the building, between neighbouring buildings and between boundaries;~~ ~~f. It will not result in an unacceptable generation of traffic, noise, or other forms of disturbance; and~~ ~~g. The proposal is compliant with all other relevant policies in the plan.~~ ~~3. The Council will consider favourably the provision of other appropriate forms of development in the Green Belt, subject to the fulfilment of the criteria set out above.~~ Strategic Policy GB~~7~~3 Positive Uses in the Green Belt Subject to policy GB2, the Council will seek opportunities to positively enhance the Green Belt for beneficial use. Where development is proposed within or adjacent to the Green Belt, consideration will be given to identified opportunities to: a. improve access; b. improve outdoor sport and recreation provision; c. enhance the landscape; d. improve visual amenity; e. improve biodiversity; f. facilitate sustainable flood risk management; or g. improve damaged and derelict land.
MM71	158	Paragraph 18.25	In order for the sea defences to be improved on Canvey Island it is necessary for land adjacent to these defences to be left free from development as far as possible to provide the space for taller defences with a larger footprint.~~,~~ Accessibility is also essential in delivering such improvements (both for facilitating the construction of new defences as well as for the access to maintain and inspect and repair the defences over their lifetime). The Environment Agency has advised that a maximum of ~~approximately~~ 19m, as measured from the landward edge of the current sea defence structure, should be left free from development for this purpose. ~~This enables the delivery of well-designed and landscaped defences that not only ensure the future safety of residents but are also attractive and contribute to the quality of the environment.~~ *INSERT A NEW PARAGRAPH AFTER 18.25 AND RENUMBER SUBSEQUENT PARAGRAPGHS* Developers are encouraged to enter into discussions with the Environment Agency at a very early stage when formulating development proposals close to or within the safeguarded sea defence area. Flood Risk Activity Permits are separate to the planning application process and are required by the Environment Agency for any activities that fall within 16m of a sea defence. Flood Risk Activity Permits were introduced under the Environmental Permitting (England and Wales) (Amendment) (No.2) Regulations in April 2016. Early discussions with the Environment Agency will avoid the potential for costly development design and layout revisions or to avoid the risk of having a flood risk permit application refused by the Environment Agency. The safeguarding provision helps to enable the delivery of well-designed and landscaped defences that not only ensure the future safety of residents but are also attractive and contribute to the quality of the environment and will reflect the clear aspiration in NPPF for plans to safeguard land that is required, or is likely to be required for current or future flood management.
	160	Policy CC2	Local Policy CC2 Tidal Flood Risk Management ~~Area~~

Ref	Page	Policy/ Paragraph	Main Modification
			1. The extent of the Canvey, Hadleigh Marshes and South Benfleet Tidal Flood Risk Management Areas is defined on the Policies Map. Within these areas: a. The Council will support the necessary improvements to the sea defences in the Borough as set out in the Thames 2100 Plan. b. New bungalows and other forms of self-contained residential accommodation at ground level will be refused on Canvey Island unless safe refuge areas can be provided within the development, and favourable consideration will be given to the conversion of bungalows to houses, subject to those privacy, amenity and urban design considerations set out in the Residential Design Guidance SPD; c. The Council will work with partners to maintain and improve nature conservation in the Hadleigh Marshes area, with a long-term view of securing appropriate compensatory sites within the Thames Estuary for any loss of ~~particular~~ designated habitats resulting from climate change; and d. South Benfleet Playing Fields will be retained as a flood storage area for both tidal flooding and surface water management. Opportunities to increase the storage capacity of this area will be secured in the long-term. 2. The Council will work with partners in the railway industry to identify economically viable solutions to the potential risk of flooding of local railway lines in the long-term, to ensure the ongoing provision of services. 3. Within flood zones 2 and 3 new development proposals will be permitted only where they meet the following criteria: a. They pass the sequential test and where appropriate the exception test, as set out in the National Planning Policy Framework; b. They have been designed to make space for water and ~~reduce the risk of flooding to prospective users/residents of the site and to neighbouring properties~~ do not increase flood risk elsewhere and where possible reduce~~s~~ flood risk overall; and c. They are designed to be flood resistant and resilient and provide safe refuge for users/residents above predicted flood water depths for a 1 in 1,000 + year climate change flood event. Buildings should also be hydrostatically and hydrodynamically resistant to prevent damage to the structure. In this context resilient includes the ability of the development to be brought quickly back into use after a flood event. 4. A buffer up to 19m wide of ~~L~~land adjacent to the existing flood defences on Canvey Island, as shown on the Policies Map, is safeguarded for future flood defence works and landscaping. The Council will consult with the Environment Agency to determine the extent of land required to be kept free from development from applications falling into this 19m wide buffer ~~Only temporary development will be permitted on this land.~~ Proposals for flood defence works within the safeguarded land, where appropriate, should provide information to support a project level HRA, as per the requirements set out in policy SD1. 5. Where land safeguarded for future flood defence works falls within a development site, opportunities should be taken to integrate future flood defence requirements into the landscaping and open space provision for the site.
MM72	163	Paragraph 18.45	Sustainable Drainage Systems (SuDS) are useful in mitigating the impact of flooding. These take a variety of forms, some of which are more appropriate in certain locations than others. The predominant soil geology underlying Castle Point is London Clay, which is impermeable, and is prone to rapid runoff. Site-specific ground investigation should be undertaken to determine the local variations in soil permeability before discounting infiltration to discharge surface water runoff from the site. If infiltration is not found to be favourable, surface water attenuation using above ground features should be used wherever possible. ~~The use of infiltration systems would not work in most cases; therefore the focus should be on the attenuation of surface water through the use of~~ These source control mechanisms ~~These can~~ would restrict the volume and rates of surface water runoff leaving a site. Underground storage tanks are the least favourable option and should only be used as a last resort.
	164	Paragraph 18.47	~~Within larger~~ For any proposed development schemes such measures can complement site control SuDS techniques. Site control SUDs techniques include the provision of balancing ponds, swales, attenuation tanks and other surface water attenuation features. The runoff from properties and sites can be routed through to such provisions and subsequently re-used for other purposes such as irrigation or as part of a greywater system. Site control SUDS can be integrated into the open spaces within development and can form part of the multi-functional Green Infrastructure network.
	164	Policy CC3 Part 1	1. The Critical Drainage Areas for the borough are defined by ~~Essex County Council~~ ECC as the Lead Local Flood Authority.
	164	Policy CC3 Part 2	2. New development proposals within an area at risk of ~~Flood Risk Zones for~~ fluvial flooding, or within an area at risk from surface water flooding in a 1 in 100 ~~1,000~~-year event, will be considered against the sequential test set out in the NPPF.
	164	Policy CC3 Part 3	3. If the sequential test shows that it is not possible to use an alternative site, the exceptions test will be applied as appropriate. Development would be permitted where through the application of the exceptions test, the sustainability benefits of the development to the community outweigh the flood risk, and that the development will be safe for its lifetime taking into account the vulnerability of its users, and that it will not increase flood risk elsewhere. ~~Built development proposals on sites where the majority of the land is at risk from non-tidal flooding will not normally be permitted unless there is a clear and robust evidence of wider sustainability benefits to the community that outweigh the flood risks.~~
	164	Policy CC3 Part 4	4. Where a development proposal is located in an area at risk of fluvial or surface water flooding and passes the sequential test and, where appropriate, the exception tests, the design and layout of development must be taken to avoid built development on those parts of the site most at risk of flooding. This includes those parts of the site that form natural or pre-existing flow paths for fluvial flood water or surface water. Easements will be required adjacent to designated Main Rivers to allow for future maintenance.
MM73	166	Paragraph 18.55	Part L of the Building Regulations details the minimum requirements for energy efficiency in new buildings. The Council would encourage developers to consider these requirements as a minimum and strive towards Zero Carbon buildings as soon as possible. The Association of South Essex Local Authorities aims to make the area carbon zero by 2040 and will introduce requirements to achieve this which will be reflected in reviews of this plan. In the meantime, there is an opportunity to limit the energy consumption of a building in the first instance through the way it is designed and located. The orientation of development is ~~also~~ important in influencing the potential to reduce energy

Ref	Page	Policy/ Paragraph	Main Modification
			consumption within the development and maximising the potential energy production from renewable sources. Building design can also provide good opportunities to manage solar gain through non-mechanical means for heating in the winter and cooling in the summer. Careful orientation and arrangement of development can provide good opportunities for solar gain and daylight penetration. Designing for daylight in the form of appropriately located and sized windows, reduces the need for artificial light, and designing for passive solar gain reduces the need for internal space heating.
	167	Paragraph 18.60	Water demand calculations in the *South Essex WCS 2012* indicate that growth in Castle Point could result in over 1 mega-litres per day (Ml/d) of additional water being needed to meet demand by 2031. This could be reduced if best practice regarding water efficiency is sought from new developments. The *South Essex WCS 2012* recommended water use of 105 lpppd. It is however recognised that there may be costs associated with achieving this level of water consumption reduction in the short-term.
	167	Paragraph 18.61	In order to achieve the water efficiency needed in South Essex as identified through the *South Essex WCS 2012*, the Council will apply the optional water efficiency requirements set out in Regulation 36(2)(b) of the Building Regulations 2010 as amended to new residential developments which will secure consumption levels at 110 lpppd, and also encourage~~,~~ measures such as rainwater harvesting, and greywater recycling schemes ~~can~~ to be installed within all developments. The equivalent BREEAM credits will be sought for non-residential developments.
	168	Policy CC4	1. All new development should seek to ~~must~~ minimise its impact on climate change arising from energy consumption by ~~the environment by incorporating the following principles~~: a. Utilising design, siting and layout to maximise opportunities for solar gain and daylight penetration, and reduce energy consumption; and ~~Incorporate measures for achieving high levels of energy efficiency, and the use of decentralised energy sources.~~ b. Integrating measures to achieve high levels of energy efficiency and where feasible and viable, decentralised energy generation, to meet as a minimum, the energy efficiency requirements of the Building Regulations. ~~Demonstrating how its design, siting and layout has maximised the opportunities for solar gain, daylight penetration and the use of decentralised energy sources~~ ~~2. The design of all new development should incorporate measures for achieving high levels of energy efficiency, and the use of decentralised energy sources. Development is expected to demonstrate how its design, siting and layout has maximised the opportunities for solar gain, daylight penetration and the use of decentralised energy sources.~~ ~~3. As a minimum non-residential development should achieve at least 50% of the credits available for reduction in CO2 emissions under the relevant BREEAM very good scheme or its equivalent for the development proposed.~~ ~~4~~ 2. The design of all new development should incorporate measures for achieving high levels of water efficiency. As a minimum: a. Residential development should meet the optional water efficiency requirements set out in part G2 and Regulation 36(2)(b) of the Building Regulations, currently 110litres/person/day; ~~a.~~b. Non-residential development should achieve at least 50% of the credits available for water consumption under the relevant BREEAM very good scheme or its equivalent for the development proposed: and ~~b~~ 3. Space should be made available within the site to enable segregated waste storage for that waste arising from the proposed use of the development. ~~5. The materials, including aggregates, used in the construction of all new buildings should be sustainable in terms of the energy that has been expended in their production, and the energy that is required to transport them to the location of the development.~~ ~~6~~4. The waste resulting from the construction of all new buildings should be managed in a way that maximises the re-use and recycling of materials, including aggregates, onsite where possible. ~~7~~ 5. Sustainability measures installed, and sustainable materials, must be consistent with the overall architectural approach of the development. Their design and siting should be an integral part of the development and must not result in prominent, dominant, alien or incongruous features which detract from the visual appearance of the development or its surroundings.
MM74	170	Paragraph 19.1	Green infrastructure is a strategically planned and delivered network of green spaces and other environmental features. It should be designed and managed as a multi-functional resource capable of delivering a wide range of environmental and quality of life benefits for local communities. Green Infrastructure, urban and rural, includes playing fields, allotments, woodlands, heathlands, marshlands, wetlands, coastlines, public parks and gardens. Within and alongside green infrastructure within Castle Point are bodies of water which form blue infrastructure. This blue infrastructure is a fundamental part of the natural environment in Castle Point with the undeveloped coast providing a key point of interaction between the terrestrial and marine environment for people and for wildlife.
	171	Paragraph 19.9	The *South Essex Green Grid Strategy* sets out a Green Infrastructure Plan for the sub-region. Strategic elements of the plan are already in place including the restoration of West Canvey Marshes (as part of South Essex Marshlands) and the creation of a nature reserve at Canvey Wick SSSI. These projects will contribute positively to the vision of the NIA. More recently, a *South Essex Green and Blue Infrastructure Strategy* has been developed for the area which looks to the future in terms of Green and Blue infrastructure planning. This includes looking to take forward further proposals to create an Estuary Park, enhancing and better linking up wildlife habitats across the South Essex area, and creating more opportunities for access and recreation for communities in South Essex. This provides a framework for further enhancements to the Green and Blue Infrastructure in South Essex and in Castle Point. Such an approach to planning for Green and Blue Infrastructure is advocated by the published *Essex Green Infrastructure Strategy*.
	171	Paragraph 19.10	The *South Essex Green Grid Strategy 2005*, and more recently the *South Essex Green and Blue Infrastructure Strategy*, identifies the significant green infrastructure assets in the borough including the coastline and coastal features along the Thames Estuary; marshland at West Canvey; Hadleigh Castle and Hadleigh Country Park; and woodlands and ancient landscape areas within Daws Heath Nature Reserves. The *Thames Gateway Historic Environment Characterisation Study 2007* identifies significant areas of historic value within the borough around the marshlands, Hadleigh Castle and Daws Heath.

Ref	Page	Policy/ Paragraph	Main Modification
	172	Paragraph 19.14	The Greater Thames Marshes Nature Improvement Area extends across the southern part of Castle Point. Within this area, the Council will work with partners to deliver projects which contribute positively to the vision for the Nature Improvement Area. Elsewhere in Castle Point, the Council will work with partners to deliver projects which extend the network of Green Infrastructure and create new habitats, providing links for wildlife and people to the Nature Improvement Area. It will encourage the management and enhancement of existing habitats and the creation of new ones to assist with species migration and to provide ways to adapt and mitigate from climate change, such as shading during higher temperatures. These actions are consistent with the recommendations set out in the *South Essex Green and Blue Infrastructure Strategy*, and the *Essex Green infrastructure Strategy.*
	170 and 172	Heading – Strategic Policy NE1 Green Infrastructure and the Undeveloped Coast	Green and Blue Infrastructure and the Undeveloped Coast
	172	Policy NE1	1. Development which results in the creation, restoration, enhancement, expansion and improved connections between green and blue infrastructure features will be encouraged. The provision of green infrastructure that offers multiple benefits to the environment and local communities will be supported. Through development proposals the Council will seek to secure: a. The preservation and enhancement of green and blue infrastructure, ecological assets, areas of nature conservation and valued landscapes; b. A measurable net increase in biodiversity, with a focus on priority habitats and priority species; c. Management of and a reduction in pollution to air, water and soil through an increased provision of green infrastructure; d. Opportunities for local food production; and e. Recreational benefits for local people, including access to coast. 2. Proposals which will result in the loss, degradation, fragmentation and / or isolation of existing green and blue infrastructure will not be supported, unless it can be demonstrated through the provision of new or enhanced green and blue infrastructure in other areas of the Borough, that there will be no overall adverse impact in the provision of green and blue infrastructure in the area. Where appropriate a project level HRA may be required alongside the consideration of the proposal, as per the requirements set out in policy SD1.
MM75	172	Policy NE2	Local Policy NE2 ~~Protection of~~ Mm27l Landscapes 1. Development which will have an impact on the ~~the~~ Daws Heath, Hadleigh Castle and Marshes, and Canvey Marshes historic natural landscapes (as identified on the Policies Map) will be supported where the proposals: a. Protect and ~~E~~enhance the character and quality of the landscape and its heritage or ecological assets having regard to the level of protection set out in policies HE1 and NE5 respectively for different designations, and the provisions of the NPPF. b. Seek to provide greater public access to and enjoyment of the landscape and its features, where appropriate. ~~c. Do not detrimentally impact the undeveloped character and visual quality of the landscape, heritage and ecological assets.~~ ~~d~~c. Mitigate any residual harm to the quality of the landscape through the provision of landscaping, which should comprise native species and must be sufficiently mature to integrate effectively into the environment and provide effective mitigation.
MM76	176	Paragraphs 19.35 – 19.37	The South Canvey ~~Green Lung~~ Wildlife Corridor Policy Context The NPPF states that planning policies should protect and enhance ~~valued landscapes and~~ biodiversity and establish coherent ecological networks. When determining planning applications local planning authorities should refuse permission if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts) adequately mitigated, or, as a last resort, compensated for. Reasoned Justification The Council has identified a 51ha area of green infrastructure (identified on the Policies Map) which provides an undeveloped ~~landscape and~~ ecological corridor across the south of Canvey Island. The area links two Local Wildlife Sites and a Potential Local Wildlife Site that are designated within the ~~Green Lung~~ Wildlife Corridor, namely Thorneycreek Fleet (CPT35) to the east, ~~and~~ Brick House Farm Marsh (CPT38) and extension to Brick House Farm (PLoWS 15) to the west as shown on the Policies Map ~~in the Local Wildlife Site Register 2019~~. Consequently, there is only 7 hectares of ~~Green Lung~~ Wildlife Corridor which is unconstrained. The ~~Green Lung~~ Wildlife Corridor acts as an ~~landscape and~~ ecological corridor across the south of Canvey Island. It links the two designated Local Wildlife Sites and has the potential to enhance habitat creation given the limits to development and public access in the area. Located within the Greater Thames Marshes Nature Improvement Area, this site has the potential to contribute towards improved ecology on farmland and the creation of lowland meadows. The Wildlife Corridor ~~Green Lung~~ also acts a buffer between existing residential development to the north and the hazardous installations to the south.

Ref	Page	Policy/ Paragraph	Main Modification
	176	Policy NE3	Local Policy NE3 The South Canvey ~~Green Lung~~ Wildlife Corridor 1. The Council will not support development within the Wildlife Corridor ~~Green Lung~~ (identified on the Policies Map) which will adversely affect its ~~openness,~~ ecological ~~and landscape~~ value, and the ability of the area to provide a strategically important ecological corridor. 2. Proposals which support the creation of new habitats, having regard to the targets for the Nature Improvement Area, will be supported.
MM77	177	Paragraph 19.40	Local Wildlife Sites (LoWS), are locally designated sites recognised as comprising priority habitats or being home to priority species. There ~~are~~ were 41 LoWSs in the Borough, which were assessed through the *Castle Point Local Wildlife Site Register 2019*. Within this list site CPT44 Poors Lane has not been endorsed through the Essex Local Wildlife Partnership, therefore at this stage can not be designated as a LoWS, as a consequence 40 LoWS can be found on the Policies Map.
	177	Paragraph 19.42	Additionally, ~~there are~~ 5 Potential Local Wildlife Sites (PLoWS) have been identified through the *Local Wildlife Site Register 2019* within the Borough~~, which~~. These are sites that are identified as having the potential to meet the LoWS selection criteria in the future through improvement to the quality of the habitats on site. Site CPT44 Poors Lane in addition to three other sites (extension to Kents Hill Wood; extension to Coombe Wood; extension to Brickhouse Farm) that were identified as forming extensions to existing LoWS but have not been endorsed through the Essex Local Wildlife Partnership, will be added to the list of PLoWS, equating to 9 PLoWS in the borough. Once the Essex Local Wildlife Partnership has recommenced these sites will be put forward to be designated as LoWS.
	177	Policy NE4 Part 3	3. Development proposals which would result in harm to either a Local Wildlife Site or a potential Local Wildlife Site will not normally be permitted unless it can be demonstrated that every reasonable effort has been taken to minimise the harm arising through avoidance. Any harm arising must be fully mitigated, or compensated, resulting in a measurable net gain in biodiversity. ~~the need for the development outweighs the harm to biodiversity.~~
MM78	178	Paragraph 19.45	The NPPF states potential and designated SPAs, Special Areas of Consideration (SACs) and Ramsar sites should be given the highest level of protection. Where a proposal affects a SPA, SAC, or Ramsar site a Habitats Regulation Assessment will be required in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended). Additionally, planning permission should be refused for developments which result~~ing~~ in in the loss of irreplaceable wildlife habitats or landscapes such as Ancient Woodlands ~~due to their irreplaceable features~~, unless there are wholly exceptional reasons and a suitable compensation strategy exists. ~~Where a proposal affects an SPA, SAC or Ramsar site, a Habitat Regulation Assessment may be required in accordance with the Conservation of Habitats and Species Regulations 2010.~~
	178	Paragraph 19.48	Habitats sites include Natura 2000 sites ~~namely Ramsar,~~ (SPA and SAC sites) and Ramsar sites which the NPPF states should be afforded similar protection. ~~Are situated within the Borough and include t~~The Benfleet and Southend Marshes SPA and Ramsar is the only Habitats site that is situated within the borough's boundary however Castle Point is also located within the Zone of Influence ~~The Borough is also within close distance~~ of other internationally designated sites and these cover the majority of the Essex coastline. Land at Holehaven Creek which is functionally linked to the Thames Estuary and Marshes SPA and Ramsar site may also be affected by development within Castle Point borough. These sites are designated for their intertidal ~~h~~Habitats and/or the presence of internationally important numbers of rare and migratory bird species, and therefore consideration must also be given to the impact that development within the borough may have indirectly on these fragile ecosystems as harm to these sites must be avoided as required by the Conservation of Habitats and Species Regulations 2017, as amended. The Habitats Regulations Assessment prepared to support the Local Plan identified a potential for population growth arising in the borough, in combination with that arising elsewhere in Essex, to have ~~a cumulative impact on Natura 2000~~ an adverse effect on integrity of Habitats sites through increased recreational pressure. Whilst on-site green infrastructure provision can offset some of this pressure and impacts from the development alone, the coast will nonetheless be a draw to visitors as it provides an environment which cannot be replicated elsewhere. There is therefore a need for residential development in the ~~B~~borough to contribute towards the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) to ensure these recreational pressures from development are appropriately avoided or mitigated in combination with other plans and projects.
	178	Paragraph 19.49	Following consultation with Natural England, an Essex~~-wide~~ Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) and Supplementary Planning Document ~~is being~~ has been prepared and adopted to include all coastal ~~Eurpoean [designated]~~ Habitats ~~S~~sites. The strategy ~~will identify where recreational disturbance is happening and the main recreational uses causing the disturbance~~ identifies a Zone of Influence (ZOI) around each Habitats site where recreational disturbance is likely to result from residential development, mitigation is required from these developments to avoid adverse effect on the integrity of the relevant Habitats sites from recreational uses. New residential development that is likely to affect the adverse integrity of the ~~European~~ Habitats ~~S~~sites will be required to contribute towards the implementation of the mitigation. ~~At this stage, it is considered that d~~ Development ~~allocations~~ in this ~~location~~ ZOI ~~will be~~ is required to pay for the implementation of mitigation measures to protect the interest features of ~~European designated~~ Habitats sites along the Essex Coast which include the Benfleet and Southend Marshes Special Protection Area and Ramsar Site, the Crouch and Roach Estuaries Special Protection Area and Ramsar site, ~~and Site of Special Scientific Interest, and~~ the Essex Estuaries Special Area of Conservation, the Blackwater Estuary, the Foulness Estuary and Thames Estuary and Marshes SPA and Ramsar site. ~~The appropriate mechanisms will be identified in the Essex Coast RAMS.~~ Applicants who do not contribute to the Essex Coast RAMS will be required to undertake their own visitor surveys to inform the Council's HRA and implement the necessary measures in perpetuity to avoid adverse effects on the integrity of the relevant Habitats sites from recreational uses.

Ref	Page	Policy/ Paragraph	Main Modification
	279	Policy NE5	*AMEND PART 1 OF POLICY NE5 AND RENUMBER SUBSEQUENT CRITERIA ACCORDINGLY* Strategic Policy NE5 Determining Applications affecting Ecologically Sensitive and Designated Sites 1. The Council will support proposals which can demonstrate a measurable net gain in biodiversity. 2. Proposals which ~~have the potential~~ are likely to cause adverse~~ly~~ ~~impact~~ effects on the integrity of (either individually or in combination with other developments) European~~,~~ and internationally designated sites, must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoiding or mitigating against impacts where identified. Where appropriate, contributions from development will be secured towards mitigation measures identified in the Essex Recreational disturbance Avoidance and Mitigation Strategy to mitigate any recreational disturbance impacts in compliance with the Habitat Regulations. 3. Proposals likely to have an adverse effect on a ~~and locally designated sites including Ramsar sites, Special Protection Areas, Special Areas of Conservation,~~ Site~~s~~ of Special Scientific Interest (SSSI) (either individually or in combination with other developments), will not be permitted unless, on an exceptional basis, the benefits of the development clearly outweigh both the adverse impacts on the features of the site and any adverse impact on the wider network of SSSIs. 4. Proposals likely to have an adverse effect on irreplaceable Habitats such as~~,~~ Ancient Woodlands ~~Local Nature Reserves~~ ~~and Special Roadside Verges~~, will not be supported unless there are wholly exceptional reasons and an appropriate avoidance, on-site management and on-site mitigation strategy is submitted to and approved by the Council. Any loss must be compensated. 5. Proposals which may result in adverse impacts to biodiversity, protected species, priority species and/or priority habitats, will only be supported if they can meet the following requirements: a. The application must demonstrate that impacts to biodiversity cannot be avoided through the location of development on an alternative site with less harmful impacts; b. Where an alternative site is not available, the development proposal should seek to avoid adverse impact to biodiversity by virtue of the design and layout of the development. The Council must be satisfied that all reasonable opportunities to avoid impact to biodiversity have been taken; c. Where it has not been possible to avoid all impacts to biodiversity, as required by a) and b), the development proposal should seek to apply management and mitigation techniques which retain and enhance biodiversity on site. The Council must be satisfied that all reasonable opportunities to secure on-site management and mitigation have been taken; d. Where it is likely that impacts to a protected species, or Biodiversity Action Plan (BAP) species is not fully addressed through a), b) and c), species relocation within the site, or to a site nearby will be required to address the remaining impacts to that species. The Council must be satisfied that the relocation site will provide a long-term suitable habitat for the species in question. A management plan must be put in place to manage the relocation site as a suitable habitat for a period of at least 20 years; then a. As a last resort, if the impacts to biodiversity in terms of both quantity and quality have not been fully addressed through a), b), c) and d), off-site compensation which would result in a net gain in biodiversity will be required. A compensation site must be identified which has the potential to be broadly equivalent to that habitat being lost, and a management plan prepared. Arrangements must be put in place to deliver that plan over a period of at least 20 years. 6.Proposals affecting ecologically sensitive sites and designated sites should be accompanied by an ecological assessment which should conform with guidance set out by the Chartered Institute of Ecology and Environmental Management (CIEEM) or an equivalent standard. Where insufficient information is provided, the Council will take a precautionary approach to the protection of ecological assets. ~~4. Contributions from relevant developments will be secured towards mitigation measures identified in the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS).~~
MM79	183	Paragraph 19.64	The Environment Agency's *Thames River Basin Management Plan* identifies that the lower Thames Estuary is of a moderate quality in terms of its ecological status and is failing to achieve a good chemical status. The plan seeks to raise both of these to `good' by 2027, to meet the requirements of the *Water Framework Directive*. The Water Framework Directive aims to secure no further deterioration of waterbodies and aims to ensure that the status of waterbodies is improved. Whilst the Thames Estuary is the main waterbody in Castle Point to which this applies, it also applies to all other main rivers in the borough also.
	183	Paragraph 19.65	The *South Essex Water Cycle Study 2012~~1~~* identifies that new development in South Essex is likely to impact on water quality. However, the Study concludes that with improvements such as through the delivery of the Asset Management Plans of the water supply company and the drainage undertakers, and through the use of Sustainable Drainage there is the capacity to accommodate growth in the borough without exceeding the qualitative and quantitative capacity of the Water Recycling Centres. ~~Measures will~~ It is recommended that the Council seeks to ensure water efficiency is achieved, and Sustainable Drainage Systems (SuDS) measures are incorporated into new development proposals, where necessary and viable, in order to minimise impacts on the drainage infrastructure, as required by the *Thames River Basin Management Plan.* *SPLIT TO CREATE NEW PARAGRAPH AND RENUMBER SUBSEQUENT PARAGRAPHS ACCORDINGLY*

Ref	Page	Policy/ Paragraph	Main Modification
			The *South Essex Water Cycle Study 2012~~1~~* recommends that improvements in water efficiency levels which reduce consumption levels to at most 105 litres per person per day (lpppd) should be achieved in new development. The application of the optional water efficiency standard in part G of the Building Regulations will help to improve water efficiency to close to this level. This is a requirement of policy CC4. *SPLIT TO CREATE NEW PARAGRAPH AND RENUMBER SUBSEQUENT PARAGRAPHS ACCORDINGLY* The ~~*Essex County Council*~~ *ECC Sustainable Drainage Systems Design Guide* ~~*Guidance 2016*~~ provides guidance on the appropriate use of SuDS in the borough. The Canvey Island Six Point Plan specifies the approach to be taken on Canvey Island in particular to managing surface water flood risk, and consequently any impact on water quality arising from surface water flows. It is especially important for Castle Point that the Six Point Plan is implemented through the Asset Management Plans of drainage undertakers, and that the impact of development on water quality is managed to ensure there is no harm to the integrity of the nearby Benfleet and Southend Marshes SPA and Ramsar site or the Thames Estuary and Marshes SPA and Ramsar site.
	184	Policy NE7	1. Development proposals should be designed to manage and reduce pollution through energy and water efficient design, the installation of sustainable drainage systems, and the delivery or enhancement of green and blue infrastructure. 2. Development proposals should be located, ~~and~~ designed and constructed in such a manner as to not cause a significant adverse effect upon the environment, the health of new and existing residents or surrounding residential amenity by reason of pollution to land, air or water, or as a result of any form of disturbance including, but not limited to, noise, light, odour, heat, dust and vibrations. 3. Development proposals adjacent to, or in the vicinity of, existing businesses or community facilities will need to demonstrate that the ongoing use of the existing businesses or community facilities would not be prejudiced by the proposed development, and that the impact of the continuing operation of the existing businesses or community facilities on the amenity of occupiers of the new development can be satisfactorily mitigated through the development proposals. 4. All major development proposals must be accompanied by a Construction Environment Management Plan prepared with regard to pollution prevention guidance. These plans shall include details of the proposed mitigation measures that will be implemented to prevent undue noise and disturbance to adjoining occupiers and Habitat sites and the entry of pollutants into the environment by all potential pathways including, but not limited to watercourses (including when dry). Where necessary, seasonal working may be required to avoid any adverse effects on the integrity of Habitats sites. ~~3.~~5. Where necessary, the Council will seek to manage and mitigate the effects of pollution and/or disturbance arising from development, (including during site clearance and construction) by means of appropriate planning conditions. Exceptionally, a Section 106 Agreement may be used to secure measures to control pollution and/or disturbance necessary to make the impacts of development acceptable.
MM80	186	Paragraph 19.79	*INSERT NEW PARAGRAPH AFTER 19.79* In terms of roles and responsibilities Anglian Water are responsible for the water discharge consents and the quality of water that is discharged from the WRCs, any exceedances of the standards required would be a matter for Anglian Water. Developers pay Anglian Water a connection fee which should be used by Anglian Water to ensure that any necessary improvements are made to the local system to ensure that there is sufficient capacity in the local drainage network and in the local WRC, as appropriate. Allocated residential sites within this Plan have been assessed by Anglian Water, as identified within the Infrastructure Delivery Plan 2020, and improvements can be made to accommodate the new development through the payment of appropriate connection fees. Any additional development that comes forward will need to be tested by Anglian Water to ensure that there is capacity within the WRCs and appropriate mitigation will be required where relevant.
	187	Policy NE10	1. All new development should demonstrate that adequate foul water treatment and drainage already exists or can be provided in time to serve the development. This must include confirmation that there is adequate quantitative and qualitative capacity at the Water Recycling Centre which would serve the development. Where either the quantitative or qualitative capacity of the Water Recycling Centre would be exceeded, or would otherwise have an adverse effect on the water quality of the nearby Benfleet and Southend Marshes SPA and Ramsar site and Thames Estuary and Marshes SPA and Ramsar site thereby affecting their integrity, either alone or in combination with other plans and projects, the proposal will be refused. ~~1.~~2. ~~Within these areas t~~ The following types of development must incorporate sustainable drainage systems that prevent surface water entering the foul/combined drainage network: a. All new developments on greenfield land; b. All new developments on land currently in use as residential garden; and c. All developments comprising the redevelopment of previously developed land. ~~2.Any development occurring beyond the extent of these areas may only connect to the foul drainage network, and must manage surface water entirely on-site through the installation of sustainable drainage systems.~~ 3. In order to ensure that the provision of sustainable drainage systems also achieve nature conservation and climate change objectives, regard should be had to policies NE1 and CC3 in their design.
MM81	188	Paragraph 20.9	20.9 All designated heritage assets within the Borough are listed within Appendix Five. At 2019, none of the designated historic assets in Castle Point Borough are included on the Historic England Heritage at Risk Register. The Council will monitor this situation throughout the plan period, and if necessary, work with the owners of assets if they are found to fall onto the Register. However, at this time no such action is required. A schedule of non-designated locally significant heritage assets can also be found in Appendix Five.

<table>
<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td></td><td>189</td><td>Policy HE1</td><td>1.~~The Council will seek to conserve and enhance heritage assets in the Borough.~~ ~~New~~ ~~d~~Development proposals affecting a heritage asset (either designated or non-designated) will be expected to conserve, and where appropriate enhance, the setting of the heritage asset, taking into account the contribution which the ~~asset,~~ setting makes to the character and appearance of the surrounding area and the original function of the asset.

2. When assessing applications for development, there will be a presumption in favour of the ~~preservation~~ conservation, and where appropriate enhancement, of ~~designated~~ all heritage assets and their setting. The Council will encourage applicants to put heritage assets to viable and appropriate use, to secure their future ~~protection~~ conservation and enhancement.

3. Development proposals affecting any heritage asset should demonstrate a comprehensive understanding of its significance. This should include an understanding of the contribution made to that significance by the current setting so that it is clear to decision makers how a change would impact on heritage significance. ~~of the importance of the heritage asset, and potential the impacts of the development on the setting of the asset~~. In assessing the impact of a development proposal on a heritage asset or its setting, the Council will consider:

a. The level of any harm or loss;

b. The significance of the asset;

c. The sustainability, economic and conservation benefits of the assets; and

d. The contribution the assets makes to local character and distinctiveness.

4. Development proposals which ~~have a significant detrimental impact on~~ would cause substantial harm to, or total loss of the significance of, a designated heritage asset will be dealt with in accordance with national policy set out in the NPPF. ~~refused unless it can be demonstrated that the public benefits of the development are substantial and would clearly outweigh the harm to the significance of the heritage asset,~~

~~5.Development proposals which result in the loss of a heritage asset will be refused unless it can be demonstrated that:~~

~~a.The nature of the heritage asset prevents any reasonable use of the site;~~

~~b.No viable use of the heritage asset can be identified through appropriate marketing of the site that will enable its conservation;~~

~~d.The loss of the asset is outweighed by the benefits the development proposals.~~

5. The effect of a development proposal~~s~~ on the significance of a non-designated heritage asset should be considered in determining the appropriateness of relevant planning applications. Consideration will be given to scale of any harm or loss, against the significance of the heritage asset.

6. ~~Planning permission will be granted for development affecting archaeological sites providing it protects, enhances and preserves sites of archaeological interest and their settings.~~ Where there is a non-designated heritage asset of archaeological interest which is demonstrably of equivalent significance to scheduled monuments, it will be considered in accordance with the requirements for designated assets as set out in part 4 of this policy. In other cases where archaeological heritage assets are known or have the potential to be present, ~~Development proposals should assess sites in consultation with the Historic Environment Record and should have taken into~~ the Council will expect a desk-based assessment and as necessary a field evaluation to have been undertaken and will take into account the archaeological importance of ~~those~~ any remains, the need for the development, the likely extent of any harm, and the likelihood of the proposal successfully preserving the archaeological interest of the site in determining any application for development.</td></tr>
<tr><td>MM82</td><td>190</td><td>Monitoring Framework Objective 1</td><td>
<table>
<tr><td rowspan="2">Balancing the population by making provision for the needs of older people and young people.</td><td>Housing mix includes homes suitable for older people:
• Bungalows
• Specialist accommodation
• Homes built to part M4(2) of the Building Regulations

~~Number of starter sized homes provided (1-2 beds)~~</td><td>At least 10% of supply

~~At least 50 starter sized homes per annum (25% of supply)~~</td></tr>
<tr><td>Number of additional bed spaces provided in residential/nursing homes.</td><td>At least ~~90~~ 300 additional bed spaces</td></tr>
</table>
</td></tr>
</table>

Ref	Page	Policy/ Paragraph	Main Modification
			Housing size mix aligns with the need identified in most recent SHMA. ~~Ensuring housing mix in accordance with Policy HO3.~~ — ~~Sites of between 0.5 and 4ha should comprise at least 35% 1 or 2 bedroom homes for general needs; and sites over 4ha should comprise at least 25% 1 or 2 bedroom homes for general needs.~~ At 2020, that requirement is: 1 Bedroom – 6% 2 Bedrooms – 22% 3 Bedrooms – 43% 4 Bedrooms + - 29%
	190	Monitoring Framework Objective 2	Make provision for additional homes, including affordable housing. — Net number of new homes provided. — In accordance with the Housing Trajectory and the 5- Year Housing Land Supply. equating to at least ~~342~~ 291 per annum on average through the first eight years of ~~out~~ the plan period and 430 per annum for the remainder of the plan period.
	191	Monitoring Framework Objective 4	Reduce the number of people commuting out of Castle Point for work. — Area of additional employment (~~B1~~ E(g), B2 and B8) floorspace provided. — More than 10,000 sqm
	192	Monitoring Framework Objective 7	*ADD A NEW MONITORING INDICATOR* Improved air quality — Number of monitoring points across the borough where NO_2 levels exceed statutory maximum limits (40 ugm-3). — Zero Improved air quality — Number of monitoring points adjacent to the Benfleet and Southend Marshes Special Protection Area where NO_2 levels have increased from base year 2021. — Zero
	192	Monitoring Framework Objective 7	*ADD A NEW MONITORING INDICATOR* To maintain and enhance the Borough's cultural heritage assets and areas, assets of historical and archaeological importance and their settings — Designated Heritage Assets on Historic England's Heritage at Risk Register — Zero
MM83	198	Appendix 3 Table 3.1	*DELETE RUNNYMEDE PADDOCKS FROM THIS TABLE* ~~Runneymede Paddocks~~ — ~~Kiln Road, Thundersley~~ — ~~Cedar Hall~~ — ~~Amenity greenspace~~
MM84	207	Appendix 4 Table 4.1	*DELTE CPT44 POORS LANE FROM TABLE* ~~CPT44 Poors Lane~~ — ~~HC1 Ancient Woodland Sites HC2 Lowland Mixed Deciduous Woodland on Non-ancient Sites~~ — ~~Lowland Mixed Deciduous Woodland~~
	207	Appendix 4 Table 4.2	*INSERT THE FOLLOWING POTENTIAL LOCAL WILDLIFE SITES* PLoWS 13 Extension to Kents Hill Wood — HC2 Lowland Mixed Deciduous Woodland on Non-ancient Sites PLoWS 14 Extension to Coombe Wood — HC1 Ancient Woodland Sites HC2 Lowland Mixed Deciduous Woodland on Non-ancient Sites PLoWS 15 Extension to Brick House Farm Marsh — HC20 Coastal Grazing Marsh SC1 Vascular Plants PLoWS 16 Poors Lane — HC1 Ancient Woodland Sites HC2 Lowland Mixed Deciduous Woodland on Non-ancient Sites
MM85	208	Appendix 5 Table 5.3	*ADD A NEW LISTED BUILDING* Benfleet There are ~~19~~20 Listed Buildings located in Benfleet Table 5.1 Benfleet Listed Buildings Tombstone of Sir Charles Nicholson and family, High Street — II — 09-11-2021
	209	Appendix 5 Table 5.3	*ADD A NEW LISTED BUILDING* Hadleigh

<table>
<tr><th>Ref</th><th>Page</th><th>Policy/ Paragraph</th><th>Main Modification</th></tr>
<tr><td></td><td></td><td></td><td>There are six ~~five~~ Listed Buildings in Hadleigh….

Table 5.3 Hadleigh Listed Buildings

<table><tr><td>Hadleigh War Memorial, Memorial Recreation Ground, London Road</td><td>II</td><td>15-06-2020</td></tr></table></td></tr>
<tr><td rowspan="6">MM86</td><td>214</td><td>Appendix 6 Glossary</td><td>INSERT DEFINITION OF ACTIVE AND SUSTAINABLE TRANSPORT INFRASTRUCTURE

<table><tr><td>-</td><td>Active and Sustainable Travel Infrastructure</td><td>Such infrastructure includes, but is not limited to, walking and cycling routes, and bridleways to promote health and wellbeing of communities, cycle storage, bus stops, bus lanes, shelters, seating, real time bus information, and electric vehicle charging points.</td></tr></table></td></tr>
<tr><td>216</td><td>Appendix 6 Glossary</td><td>INSERT DEFINITION OF DEVELOPMENT BRIEF AFTER DEVELOPMENT

<table><tr><td>-</td><td>Development Brief</td><td>A development brief is a document that is prepared in advance of a planning application and sets out the vision, constraints, opportunities and considerations for the site such as access, biodiversity and infrastructure. Within this Plan development briefs are required for certain residential allocations but are usually for residential development schemes of 10-60 units.</td></tr></table></td></tr>
<tr><td>216</td><td>Appendix 6 Glossary</td><td>INSERT RELEVANT ABBREVIATION AND DEFINITION OF ESSEX COUNTY COUNCIL

<table><tr><td>ECC</td><td>Essex County Council</td><td>Castle Point Borough is a two-tier authority area, with ECC providing a range of services and infrastructure such as (but not limited to) highways and transportation, education and social services, and surface water management at a county-wide level.</td></tr></table></td></tr>
<tr><td>217</td><td>Appendix 6 Glossary</td><td>INSERT RELEVANT ABBREVIATION AND DEFINITION OF INFRASTRUCTURE DELIVERY PLAN AFTER INFRASTRUCTURE

<table><tr><td>IDP</td><td>Infrastructure Delivery Plan</td><td>This document sets out the infrastructure requirements for the borough, including but not limited to highways, healthcare, education and open space. It includes timescales, costs and how it will be delivered.</td></tr></table></td></tr>
<tr><td>217</td><td>Appendix 6 Glossary</td><td>INSERT DEFINITION OF A MASTER PLAN AFTER MARINE CONSERVATION ZONE

<table><tr><td>-</td><td>Master Plan</td><td>A master plan is a document that is prepared in advance of a planning application and sets out the vision, constraints, opportunities and considerations for the site such as access, biodiversity and infrastructure. Preparation of a master plan should include engagement with the community, stakeholders and the Council. Master plans are usually required for residential development schemes of 60+ units. In some instances the Council may adopt a master plan as a Supplementary Planning Document depending on the scale and complexity of the particular site.</td></tr></table></td></tr>
<tr><td>219</td><td>Appendix 6 Glossary</td><td>INSERT RELEVANT ABBREVIATION AND DEFINITION OF POTENTIAL LOCAL WILDLIFE SITE AFTER POLICIES MAP

<table><tr><td>PLoWS</td><td>Potential Local Wildlife Site</td><td>These are areas of land with potential for wildlife value. Potential Local Wildlife Sites have the potential to support both locally and nationally threatened wildlife, and sites may contain habitats and species that are priorities under the Essex or UK Biodiversity Action Plans that sets out strategies for the conservation of much of our most vulnerable wildlife. Potential Local Wildlife Sites may be endorsed through the plan period by the Essex Local Wildlife Site Partnership, when this occurs these sites will be designated as Local Wildlife Sites.</td></tr></table></td></tr>
<tr><td>220</td><td>Appendix 6 Glossary</td><td>UPDATE LATEST USE CLASSES

<table><tr><td>-</td><td>Use Classes Order</td><td>The Town and Country Planning (Use Classes) Order 1987 puts uses of land and buildings into various categories. Planning permission is not needed for changes of use within the same use class.
~~The A use classes consist of:~~
~~A1 - shops and retail outlets~~
~~A2 - financial and professional services~~
~~A3 - restaurants and cafes~~
~~A4 - drinking establishments~~
~~A5 - hot food and takeaway~~
The B use classes consist of:
~~B1 - business~~
B2 - general industrial
B8 - storage or distribution:
The C use classes consist of: C1 – hotels
C2 - residential institutions
C2A - secure residential institution
C3 - dwellinghouses
C4 - houses in multiple occupation
~~The D use classes consist of:~~
~~D1 - non-residential institutions~~
~~D2 - assembly and leisure~~
The E use classes consist of
E(a) Display or retail sale of goods, other than hot food
E(b) Sale of food and drink for consumption (mostly) on the premises</td></tr></table></td></tr>
</table>

Ref	Page	Policy/ Paragraph	Main Modification
			E(c) Provision of: • E(c)(i) Financial services, • E(c)(ii) Professional services (other than health or medical services), or • E(c)(iii) Other appropriate services in a commercial, business or service locality E(d) Indoor sport, recreation or fitness (not involving motorised vehicles or firearms or use as a swimming pool or skating rink,) E(e) Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner) E(f) Creche, day nursery or day centre (not including a residential use) E(g) Uses which can be carried out in a residential area without detriment to its amenity: • E(g)(i) Offices to carry out any operational or administrative functions, • E(g)(ii) Research and development of products or processes • E(g)(iii) Industrial processes The F use classes consist of: F1 Learning and non-residential institutions – Use (not including residential use) defined in 7 parts: • F1(a) Provision of education • F1(b) Display of works of art (otherwise than for sale or hire) • F1(c) Museums • F1(d) Public libraries or public reading rooms • F1(e) Public halls or exhibition halls • F1(f) Public worship or religious instruction (or in connection with such use) • F1(g) Law courts F2 Local community – Use as defined in 4 parts: • F2(a) Shops (mostly) selling essential goods, including food, where the shop's premises do not exceed 280 square metres and there is no other such facility within 1000 metres • F2(b) Halls or meeting places for the principal use of the local community • F2(c) Areas or places for outdoor sport or recreation (not involving motorised vehicles or firearms) • F2(d) Indoor or outdoor swimming pools or skating rinks Sui Generis Certain uses do not fall within any use class and are considered 'sui generis'.
MM87	222	Appendix 7	*AMEND APPENDIX 7 TITLE* Appendix Seven: ~~Policy Changes From the Castle Point Local Plan 1998 (Saved Policies 2007)~~ Superseded Policies
	222	Table 7.1	*INSERT THE BELOW TEXT ABOVE TABLE 7.1* Policies in this plan will replace in their entirety the 2007 saved policies from the Castle Point Borough Local Plan adopted in 1998.
	222	Appendix 7	

Saved policies 2007	Relevant policies in the new Local Plan
Green Belt	
GB2 – Re-use of buildings in the Green Belt	~~GB3, GB5, GB6~~ GB2
GB4 – Rebuilding of existing dwellings in the Green Belt	~~GB3, GB5, GB6~~ GB2
GB5 – Extensions to dwellings	~~GB3~~ GB2
GB6 – Garden extensions	Not included
GB7 – Agricultural dwellings	~~GB6~~ GB2
Environment and conservation	
EC2 - Design	DS1
EC3 – Residential amenity	NE7
EC4 - Pollution	NE1, NE7
EC5 – Crime prevention	DS1
EC7 – Natural and semi-natural features in urban areas	HS1, HS7, NE1, NE2, NE6
EC8 – The green lung	NE3
EC9 – Development affecting commercial farmland	Not included
EC10 – Protection of high quality agricultural land	Not included
EC13 – Protection of wildlife and their habitats	NE1, NE3, NE4, NE5
EC14 – Creation of new wildlife habitats	NE1, NE3, NE5
EC15 – Control of permitted development in sensitive areas	NE5
EC16 – Protection of landscape	NE2, NE6

Ref	Page	Policy/ Paragraph	Main Modification

EC17 – Special landscape area	NE2
EC18 – Permitted development in the special landscape area	NE2, NE6
EC19 – Ancient landscapes	NE2, NE6
EC20 – Landscape improvement area	Not included
EC21 – Woodland management and tree preservation orders	HS7, HS3, NE6
EC22 – Retention of trees, woodland and hedgerows	NE6
EC23 – Tree and shrub planting	DS2
EC25 – Principles of control	HE1, HS7, NE5
EC26 – Design and development	HE1
EC27 – Planning applications	Not included
EC28 – Restrictions on permitted development	HE1
EC29 – Control of demolition	HE1
EC30 – Shopfront design	DS4
EC31 - Advertisements	DS3
EC32 – Protection from demolition	HE1
EC33 – Alterations to listed buildings	~~Not included~~ HE1
EC34 – Setting of listed buildings	Appendix 5
EC35 – Re-use of listed buildings	HE1
EC36 – Grant aid	Not included
EC37 – Local list of buildings	Appendix 6
EC38 – Archaeological sites and monuments	HE1, Appendix 5
EC39 – Seafront entertainment area	EC3
Housing	
H2 – Residential land	HO1
H3 – New development sites	HO30 (Remaining ~~S~~sites no longer relevant)
H4 – Safeguarding of land for long term housing needs	Sites no longer relevant
H5 – Safeguarding of land for long term housing needs	Sites no longer relevant
H6 – Safeguarding of land for long term housing needs	Sites no longer relevant
H7 – Affordable housing	HO4
H9 – New housing densities	HO1, DS1
H10 – Mix of development	HO3
H11 – Accessible and wheelchair housing	~~Not included~~ DS1
H12 – Piecemeal development	Not included
H13 – Location of development	HO1, HO9-HO32
H14 – Living over the shop	HO1, TC2
H16 – Winter gardens	Not included
H17 – Housing development – design and layout	DS1, chapter 10
Employment	
ED1 – Provision of land to the south of Northwick Road	EC2
ED2 – Long term employment needs	EC2
ED3 – Protection of employment areas	EC1
ED5 – Piecemeal development	Not included
ED6 – Parking and servicing	~~TP7,~~ TP8, TP9
ED7 – Environmental improvements	DS1, CC1, NE5
ED9 – Hazardous installations	NE9
Shopping	
S1 – Location of retail development	TC1, TC3, TC5, TC6, TC7
S2 – Shopping facilities at Rayleigh Weir	TC4
S3 – Primary shopping frontages	TC1
S4 – Non-retail development	TC1, TC2
S5 – Parking and servicing	~~TP7,~~ TP8, TP9
S7 – Environmental improvements	DS1, TC2
S9 – Local shopping parades	TC3
S10 – Supermarket and retail warehouse development	TC4
S12 – Design, siting and illumination of advertisements	DS3
S13 – Proliferation of advertisements	DS3
S14 – Advertisements and public safety	DS3

Ref	Page	Policy/ Paragraph	Main Modification

S15 – Hoardings and poster panels	DS3
Transport	
T1 – Strategic highway network	TP1, TP2
T2 – Intensification of access use	TP4
T5 – New link road access to employment land	Not included
T6 – Access to employment land	EC2
T7 – Unmade roads	Not included
T8 – Car parking standards	TP8~~7~~
T10 - Cycleways	TP1, TP4~~3~~, TP5~~4~~, TP7~~6~~
T11 – Cycleway construction	TP1, TP4~~3~~, TP5~~4~~, TP7~~6~~
T12 – Bus services	TP1, TP5~~4~~
T15 – Water-borne freight	Not included
Recreation	
RE2 – Golf courses	HS3
RE4 – Provision of children's play space and parks	HS3
RE5 – Public open space	HS7
RE6 - Allotments	HS7
RE7 – Romsey Road allotments	HS7
RE8 – Hadleigh Castle Country Park	Not included
RE9 – Informal recreation in the countryside	Not included
RE10 – Water recreation	Not included
RE12 – Public rights of way	HS3, TP4~~3~~
RE14 – Planning agreements and recreational development	HO1, SD2
Community facilities	
CF1 – Social and physical infrastructure and new developments	Infrastructure Delivery Programme (IDP)
CF2 – Education facilities	HS4
CF4 – Workplace nurseries	Not included
CF6 – Places of worship and community centres	HS6
CF7 – Health facilities	HS5
CF8 – Non-residential health care	HS5
CF9 – Access and non-domestic development	Not included
CF12 – Powerlines and cables	CM1
CF13 – Phasing of development	Chapter 9 and 10
CF14 – Surface water disposal	CC3
CF15 – Water supply	CC4
CF16 - Telecommunications	CM1
CF17 – Waste recycling	CC4, TP9~~8~~

MM88 | 225 | Appendix 7

INSERT A NEW APPENDIX AFTER APPENDIX 7 SETTING OUT A SCHEDULE OF COMMUNITY FACILITIES

Appendix Eight: Community Facilities

The Table below lists the community facilities as identified on the Policies Map. These community facilities are subject to Policy HS6.

Table 8.1: List of Community Facilities

Community facility	Address	Type of community facility
Glenwood School	Rushbottom Lane, Thundersley	Education
Montgomerie primary School	Rushbottom Lane, Thundersley	Education
Woodham Ley Primary School	Rushbottom Lane, Thundersley	Education
St Georges Church	Rushbottom Lane, Thundersley	Religious establishment
St Georges Medical Practice	Rushbottom Lane, Thundersley	Healthcare
Hesten Day Centre	Off Church Road, Thunderlsey	Community centre
The Robert Drake Primary School	Off Church Road, Thunderlsey	Education
Great Tarpots Library	London Road, Thundersley	Library
Thundersley Methodist Church	Kennington Avenue, Thudnderlsey	Religious establishment
Kingdom Hall of Jevoah's Witnesses	Selbourne Road, Thundersley	Religious establishment
St Peters Church	Off Church Road, Thunderlsey	Religious establishment
St Peters Pre-School	Off Church Road, Thunderlsey	Education
Kingston Primary School	Off Church Road, Thunderlsey	Education
Thundersley Primary School	Dark Lane, Thundersley	Education
Little Footprints Nursery	Dark Lane, Thundersley	Education

Ref	Page	Policy/ Paragraph	Main Modification

Hart Road Surgery	Off Hart Road, Thundersley	Healthcare
Cedar Hall School	Off Hart Road, Thundersley	Education
Thundersley Congregational Church	Kenneth Road/ London Road, Thundersley	Religious establishment
SEEVIC (USP) College	Kiln Road, Thundersley	Education
Castle Point Borough Concil	Kiln Road, Thundersley	Community centre
Runnymede Leisure Centre	Off Kiln Road, Thundersley	Sport and recreation
Runnymede Pre School	Off Kiln Road, Thundersley	Education
Runnymede Hall	Off Kiln Road, Thundersley	Community Hall
The Deanes School	Off Daws Heath Road, Thundersley	Education
The Enchanted Wood Pre School	Off Daws Heath Road, Thundersley	Education
The Deanes Sports Centre	Off Daws Heath Road, Thundersley	Sport and recreation
Rayleigh Weir Fire Station	Rayleigh Road / Stadium Way, Thundersley	Emergency Services
Rayleigh Ambulance Station	Claydons Lane, Thundersley	Emergency Services
Daws Heath Social Hall	Off Daws Heath Road, Daws Heath	Community Hall
Daws Heath Evangelical Church	Off Daws Heath Road, Daws Heath	Religious establishment
St Michael and All Angels Church	St Michael's Road, Daws Heath	Religious establishment
St Michael's Church Hall	St Michael's Road, Daws Heath	Community Hall
Virgin Active	Rayleigh Road, Thundersley	Sport and recreation
Westwood Academy	Beresford Close, Hadleigh	Education
The Hollies Surgery	Rectory Road / Softwater Lane, Hadleigh	Healthcare
Hadleigh URC Church	Off Church Road, Hadleigh	Religious establishment
Hadleigh Infants and Nursery School	Off Bilton Road, Hadleigh	Education
St Barnabas Church	Woodfield Road, Hadleigh	Religious establishment
St James the Less	London Road / High Street, Hadleigh	Religious establishment
The Salvation Army	London Road, Hadleigh	Religious establishment
St Thomas More Church Hall	High Street, Hadliegh	Community Hall
Hadleigh Methodist Church	Chapel Lane, Hadleigh	Religious establishment
TGH Evangelical Church	Kiln Road, Thundersley	Religious establishment
The King John School	Shipwrights Drive / Benfleet Road, Thundersley	Education
Holy Family Church Benfleet	High Road, South Benfleet	Religious establishment
Jotmans Hall Primary School	High Road, South Benfleet	Education
The Appleton School	Croft Road, South Benfleet	Education
Holy Family Catholic Primary School	Kents Hill Road, South Benfleet	Education
Kents Hill Infants and Junior School	Kents Hill Road, South Benfleet	Education
St Mary's Church Hall	High Road, South Benfleet	Community Hall
South Benfleet Primary School	Off Richmond Avenue, South Benfleet	Education
Richmond Pre-School CIC	High Road, South Benfleet	Education
Richmond Hall	Off Richmond Avenue, South Benfleet	Community Hall
Benfleet Theatre School	Off Richmond Avenue, South Benfleet	Sport and recreation
Benfleet Baptist Church	Kents Hill Road / Constitution Hill, South Benfleet	Religious establishment
Benfleet Surgery	Constitution Hill, South Benfleet	Healthcare
South Benfleet Library	Constitution Hill / High Road, South Benfleet	Library
Oasis Christian Fellowship	High Road, South Benfleet	Religious establishment
Benfleet Methodist Church	High Road, South Benfleet	Religious establishment
Church of St Mary the Virgin, South Benfleet	High Road, South Benfleet	Religious establishment
Wesley Pre School	Hall Farm Road, South Benfleet	Education
Essex Way Surgery	Essex Way, South Benfleet	Healthcare
Waterside Farm Leisure Centre	Off Somnes Avenue, Canvey Island	Sport and recreation
The Cornelius Vermuyden School	Off Dinant Avenue, Canvey Island	Education
Northwick Park Primary and Nursery Academy	Off Third Avenue, Canvey Island	Education
Third Avenue Healthcare Centre	Third Avenue, Canvey Island	Healthcare
Canvey Island Heritage Centre and Museum	Canvey Road, Canvey Island	Sport and recreation
St Katherine's Church of England Primary School	Off Hilton Road, Canvey Island	Education
Winter Gardens Academy	Link Road, Canvey Island	Education
Winter gardens Baptist Church	Hilton Road, Canvey Island	Religious establishment
Kingdom Hall of Jehovah's Witnesses	Off Meppel Avenue, Canvey Island	Religious establishment
Jewish Congregation of Canvey Island	Off Meppel Avenue, Canvey Island	Religious establishment
South Essex College - PROCAT	Off Meppel Avenue / Somnes Avenue, Canvey Island	Education
Canvey Village Surgery	Long Road, Canvey Island	Healthcare
The Surgery	Hawkesbury Road, Canvey Island	Healthcare
Canvey Junior School	Off Long Road, Canvey Island	Education

Ref	Page	Policy/ Paragraph	Main Modification

Hawkesbury Pre-School	Off Long Road, Canvey Island	Education
Canvey Island Infant School	Off Long Road, Canvey Island	Education
Our Lady of Canvey and The English Martyrs R C Church	Long Road, Canvey Island	Religious establishment
St Nicholas Anglican Church	Long Road, Canvey Island	Religious establishment
William Read Primary School and Nursery	Long Road, Canvey Island	Education
Canvey Island Police Station	Long Road, Canvey Island	Emergency Services
Canvey Island Fire Station	Long Road, Canvey Island	Emergency Services
Little Tewkes Pre-School	Dovervelt Road, Canvey Island	Education
Methodist Church	Waarden Road, Canvey Island	Religious establishment
Little Nippers Pre School	Waarden Road, Canvey Island	Education
St Joseph's Catholic Primary School	Vaagen Road, Canvey Island	Education
The Paddocks Community Centre	Off Long Road, Canvey Island	Community Hall
Central Canvey Primary Care Centre	Off Long Road, Canvey Island	Heathcare
Castle View School	Furtherwick Road, Canvey Island	Education
Willow Pre School Playgroup	Blackthorne Road, Canvey Island	Education
Canvey Island Youth Project	Poplar Road, Canvey Island	Community centre
Canvey Island Library	Elder Tree Road, Canvey Island	Library
Canvey Island War Memorial Hall	High Street, Canvey Island	Community Hall
Canvey Island Baptist Church	High Street, Canvey Island	Religious establishment
The Salvation Army	Mitchells Avenue, Canvey Island	Religious establishment
Smallgains Hall	Off Creek Road, Canvey Island	Community Hall
Lubbins Park Primary School and Nursery	Off May Avenu, Canvey Island	Education
Saint Annes Church	Off St Annes Road, Canvey Island	Religious establishment
Leigh Beck Junior School	Off Point Road, Canvey Island	Education
Leigh Beck Infant and Nursery Academy	Off Point Road, Canvey Island	Education
Thundersley Clinic	Kenneth Road, Thundersley	Healthcare
Benfleet Clinic	High Road, South Benfleet	Healthcare
Hadleigh Junior School	Church Road / The Avenue, Hadleigh	Education
Hadleigh Clinic	London Road, Hadleigh	Healthcare
Sandscastles Nursery	London Road, Hadleigh	Education
Georgie Porgie Ltd	London Road, Hadleigh	Education
Queen Bee's Day Nursery and Pre School	London Road, Thundersley	Education
Thundersley Christian Spiritualist Church	London Road, Thundersley	Religious establishment
Canvey Island Transport Museum	Point Road, Canvey Island	Sport and recreation
Canvey Island Rugby Union Football Club	Dovervelt Road, Canvey Island	Sports and Community

Appendix 2– Additional Modifications

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
AM1	Front cover	Front cover	~~Pre-submission Plan~~ 2018-2033 ~~December 2019~~ March 2022	To reflect date and updated stage of document
AM2	0	Contents (Chapter 8)	Making Effective Use of Land and Creating Sustainable Places	Reflects update to policy name
	0	Contents (Chapter 9)	*INSERT POLICY TITLE AFTER 'PREVENTING LOSS OF HOUSING'* Caravan and Park Homes	Formatting error
	0	Contents (Chapter 10)	Land north of Grasmere Road and B~~a~~orrowdale	Typo
	0	Contents (Chapter 12)	Fast Food Outlets	Reflects update to policy name
	0	Contents (Chapter 13)	Health and Social Care Provision ~~Facilities~~	Reflects update to policy name
	0	Contents (Chapter 14)	Improvements and Alterations to ~~Roads~~ Highway Infrastructure	Reflects update to policy name
	0	Contents (Chapter 14)	*INSERT NEW POLICY TITLE AFTER 'IMPROVEMENTS AND ALTERATIONS TO ROADS'* New and Improved Access to Canvey Island	Reflects proposed new policy
	0	Contents (Chapter 14)	Improvements to ~~Footpaths, Bridleways and Cycling~~ Active Travel Infrastructure	Reflects update to policy name

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
	0	Contents (Chapter 17)	~~New~~ Development in the Green Belt	Reflects update to policy name
	0	Contents (Chapter 17)	*DELETE THE FOLLOWING POLICY TITLES FROM THE CONTENTS PAGE* ~~Extensions and Alterations to, and Replacements of Buildings in the Green Belt~~ ~~Limited Infill and Self-Build – Special Policy Areas~~ ~~Change of Use of Buildings and Land in the Green Belt~~ ~~Ancillary Buildings and Structures in the Green Belt~~ ~~Enclosure and Boundary Treatment in the Green Belt~~	Reflects deleted policies
	0	Contents (Chapter 19)	Green and Blue Infrastructure and the Undeveloped Coast	Reflects update to policy name
	0	Contents (Chapter 19)	The South Canvey ~~Green Lung~~ Wildlife Corridor	Reflects update to policy name
	0	Contents (Appendix Seven)	Appendix Seven: ~~Policy Changes From the Castle Point Local Plan 1998 (Saved Policies 2007)~~ Superseded Policies	Reflects update to appendix name
	0	Contents (Appendix Seven)	*ADD NEW CRITERIA AFTER APPENDIX SEVEN* Appendix Eight: Community Facilities	Reflects proposed new appendix
AM3	1	Chapter 1	*DELETE THE BELOW TEXT AND CHAPTER TITLE. THIS WILL BE REPLACED WITH A FOREWORD AT THE POINT OF ADOPTION OF THE LOCAL PLAN* 1. Foreword ~~How to make representations to this draft Local Plan~~ ~~The new Local Plan is available on the Councils website along with a corresponding Policies Map, which spatially sets out the policies found within the Local Plan. The technical evidence that supports the Plan and any relevant information to help inform your response is available to view online. This can be found here: www.castlepoint.gov.uk/new-local-plan~~ ~~Comments can be made using the online portal found on: www.castlepoint.gov.uk/local-planconsultation. Comments should be targeted to specific sections of the~~	Removed as text is out of date

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			~~document, for example a specific policy or paragraph number.~~ ~~Alternatively, comments can be made using the Pre-Submission Regulation 19 Consultation Response Booklet by email localplan@castlepoint.gov.uk or by post to Local Plan Consultation, Castle Point Borough Council, Kiln Road, Thundersley, Benfleet, SS7 1TF.~~ ~~The Pre-Submission Regulation 19 Consultation Response Booklet is available on the Council website, the Council Offices, and local Borough libraries.~~ ~~Comments should be made on whether the plan as a whole or in part is legally compliant and meets the test of soundness. Details of what these mean and how to complete the form can be found on the website. Copies of the local plan and associated documents are available to view at the Council offices and local libraries.~~ ~~Local Plan Consultation,~~ ~~Castle Point Borough Council,~~ ~~Council Offices,~~ ~~Kiln Road,~~ ~~Thundersley,~~ ~~Essex~~ ~~SS7 1TF~~	
AM4	2	Paragraph 2.3	~~This~~ These documents comprise~~s~~ the full suite of strategic policies, allocation policies and development management policies...	Representation 328 ECC
	2	Paragraph 2.4	The strategic policies within this plan set out an overarching strategy for the pattern, scale and quality of development...	Representation 328 ECC
	2	Paragraph 2.5	The local policies within this plan identify the specific location where development and change will occur within the borough.	Consistency with paragraph 2.4
	2	Paragraph 2.8	The evidence for the Local Plan, does where appropriate take account of that prepared for previous draft plans in 2014 and 2016. The New Local Plan has also been informed by the	Factual update

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			responses received during its preparation and examination. ~~the Regulation 18 Consultation undertaken in 2018.~~ Having regard to the consultation responses, the Council aims to secure improvements to road infrastructure and community facilities alongside the delivery of new development.	
AM5	5	Paragraph 3.6	The National Planning Policy Framework (NPPF, 20~~19~~21) sets out the Government's planning policies for achieving sustainable development, plan making and taking decisions on planning applications. Local Plans are key to delivering sustainable development and must therefore be prepared in accordance with the principles and policies set out in the NPPF. The NPPF is supplemented by National Planning Practice Guidance (NPPG) which consolidates and updates technical advice and guidance on planning matters.	Revised NPPF
	6	Paragraph 3.10	Alongside the NPPF the Government published a separate Planning Policy for Traveller Sites (PPTS). As with the NPPF, this Plan sets out the requirements for local planning authorities when preparing Local Plans and taking decisions on planning applications. The requirements of this separate document ~~will be~~ are drawn out in the housing section of the New Local Plan.	Grammar
	6	Paragraph 3.14	Opportunity South Essex (OSE) is a business-led partnership which supports the delivery of regeneration and economic growth projects as set out in the SELEP Growth Deal and associated Strategic Economic Plan in South Essex. The South Essex local authorities comprising Basildon, Castle Point, Rochford, Southend-on-Sea and Thurrock, as well as Essex County Council (ECC) sit on that partnership.	Insertion of the acronym
	6	Paragraph 3.14	*INSERT A NEW PARAGRAPH AFTER AND RENUMBER REMAINING PARAGRAPHS ACCORDINGLY* In respect of Transport infrastructure, the Cities and Local Government	Representation 332 ECC

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			Devolution Act (2016) introduced Sub-national Transport Bodies (STB). Government sees STBs delivering improved collective transport planning and decision making over areas larger than current transport authorities. Essex and Castle Point fall within the area covered by Transport East. Transport East is responsible for the development of a high-level transport strategy linked to the delivery of economic growth and prosperity and has a functional link with spatial planning. To deliver its strategy Transport East will seek to - • Work with Highways England to "Co-create" the future Road Investment Strategy (RIS) programme for the strategic road network • Define and prioritise investment programmes for the new Major Road Network. • Influence Network Rail investment by the "Co-creation" of an investment programme via the new Rail Network Enhancements Pipeline (RNEP). • Seek to Influence future rail franchise specifications. • Advise Government on other major transport scheme funding decisions. • Provide regional co-ordination and best practice across the East of England.	
	7	Paragraph 3.16	~~Essex County Council~~ ECC is the waste planning authority for the borough, and is responsible for preparing planning policies, and for assessing applications for waste management development…	Amended for consistency
	7	Paragraph 3.17	*MOVE PARAGRAPH TO ABOVE PARAGRAPH 3.15 AND RENUMBER REMAINING PARAGRAPHS ACCORDINGLY* ~~Integrated County Strategy~~ Castle Point Borough Council is a two-tier authority area, with ~~Essex County Council~~ ECC providing a range of services and infrastructure such as (but not limited to) highways and transportation, education, social	Representation 333 ECC

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			services, and surface water management at a county-wide level. The County Council ~~Strategy~~ focuses the provision of services to achieve the greatest benefit to delivering a buoyant economy for both the existing and future residents and businesses in Essex. ~~Essex County Council~~ ECC has also published several strategic policies and guidance documents in relation to ECC services and infrastructure provision and delivery, which are relevant to development and growth in the borough. These are ~~will be~~ referenced throughout the Local Plan where relevant.	
	7	Paragraph 3.18	*INSERT THREE NEW PARAGRAPHS BEFORE PARAGRAPH 3.18 UNDER 'ESSEX LOCAL TRANSPORT PLAN' AND RENUMBER REMAINING PARAGRAPHS ACCORDINGLY* ECC is the Local Highway Authority, with a responsibility to manage and maintain the highway network, and the Local Transport Authority, with transport planning responsibilities for the administrative area of Essex. Under the Transport Act 2000 (as amended by the Local Transport Act 2008), ECC must develop a transport strategy that includes policies for the promotion and encouragement of safe, integrated, efficient and economic transport facilities and services to, from and within their area, that are required to meet the needs of persons living or working in the authority's area, or visiting or travelling through that area, including those required for the transportation of freight. The transport strategy and supporting transport policies are contained within the Local Transport Plan (LTP) and it is the responsibility of ECC as the Local Transport Authority to produce, maintain and update the LTP. The County Council's current statutory transportation strategy is contained in its third Local Transport Plan (LTP3), the "Essex Transport Strategy" that was adopted formally in July 2011. In this document, ECC states that "Our Vision is for a transport system that supports sustainable economic growth	Representations 332 and 334 ECC

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			and helps deliver the best quality of life for the residents of Essex." The LTP identifies that effective transport networks are essential to ensure the efficient and effective movement of people and goods necessary to support a thriving economy, and that it is essential that transport networks are developed in an integrated way that not only supports growth and increased prosperity but does this in a way that creates great places to live, work and visit and also enables people to live independently and make the most of the opportunities available to them. The LTP prioritises the effective use of the current network including support for less infrastructure intensive and more sustainable forms of transport. Investment is then targeted at local improvements such as addressing pinch points, improving sustainable transport and providing access to new developments; before considering investment in more significant new infrastructure is considered. *AMEND PARAGRAPH 3.18 WITH THE FOLLOWING TEXT* The LTP ~~The *Essex Local Transport Plan (2011)(LTP)* sets out the 15 year vision to improve travel in the county and underlines the importance of the transport network in achieving sustainable, long term economic growth and enriching the lives of residents. It~~ is supplemented by delivery strategies for public transport, highways, cycling and public rights of way. ~~*Essex County Council*~~ ECC's published *Sustainable Modes of Travel Strategy* ~~*2016*~~ supports different modes of transport and seeks to create a sustainable framework to provide ~~aims to give~~ residents a real choice in the way in which they travel. *INSERT A NEW PARAGRAPH AFTER PARAGRAPH 3.18 AND RENUMBER SUBSEQUENT PARAGRAPHS THEREAFTER ACCORDINGLY* As Thurrock and Southend are unitary authorities with their own Local Transport Plans, ECC and these two	

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			neighbouring authorities work closely on projects in the South Essex area. South Essex is subject to national and strategic highway improvements which are being developed on a cross boundary basis. These include: a. A127 Corridor for Growth: An Economic Plan (March 2014) and the A127 Route Management Strategy. b. The A127 Task Force. c. South Essex strategic route network including the A13 corridor, A130 and A127/A130 Fairglen Interchange d. National road network including the M25, A13 and the Lower Thames Crossing	
	7	Paragraph 3.19	~~Strategic Policy for Greater Essex~~ Essex Prosperity and Productivity Plan The Essex Prosperity and Productivity Plan (2020) sets out the framework for an economy in which productive businesses create high-value, sustainable jobs and in which everyone benefits from growth. Looking forward 20 years and setting out priorities for the next five, it is flexible in the light of technological change, collaborative in its approach to delivery and optimistic about the potential of businesses, people and communities. The document identifies four 'Missions' for the Essex economy: 1. Dynamic: Driving the creation and adoption of new ideas and opportunities – leading to higher value employment over the long term 2. Resilient: Adaptable for the long term – in the context of climate change, new technology and changing markets 3. Inclusive: Supporting a growing and changing population, investing in new and existing communities and quality of life 4. Connected: Creating better, more sustainable networks within	Representation 335 ECC

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			Essex – and open to our neighbours, the UK and the world ~~The *Economic Plan for Essex 2014* provides a vision for Essex, to identify the priorities needed to achieve increased economic growth. The purpose of the Plan is to help ensure that available funding is invested towards priorities which are most likely to generate long term economic growth. The *Economic Plan for Essex 2014* remains consistent with this strategic ambition and was developed in conjunction with the district, borough and city councils in Essex. It identified the steps that local partners will take together, alongside te private sector and the Government to accelerate local growth over a seven year period (2014-2021) and lays the foundation for long term sustainable growth in the years to follow. The *Economic Plan for Essex 2014* has three ambitions:~~ ~~Improve skills~~ ~~Infrastructure investment in four strategic growth corridors~~ ~~Enhance productivity~~	
	7	Paragraph 3.19	*INSERT NEW SECTION AFTER PARAGRAPH 3.19 AND RENUMBER REMAINING PARAGRAPHS ACCORDINGLY* Essex Green Infrastructure Strategy The Essex Green Infrastructure Strategy (2020) sets out a positive approach to the delivery of green infrastructure in Greater Essex. It aims to enhance the urban and rural environment, through creating better connected, multi-functional green infrastructure that delivers multiple benefits to people and wildlife. The strategy provides an understanding of and the opportunities to improve the quality and value of our green infrastructure. It identifies a clear vison and associated principles that will inform and contribute to a range of national, regional and local goals and objectives. It outlines an approach that	Representation 337 ECC

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			requires a change to the way we think about and value our green and blue infrastructure. A carefully planned green infrastructure network is crucial for the environment, our health and well-being and will help support a thriving, sustainable economy.	
	7	Paragraph 3.20	*INSERT NEW SECTION BEFORE PARAGRAPH 3.20 AND RENUMBER REMAINING PARAGRAPHS ACCORDINGLY* Strategic Policies for the Thames Castle Point sits on the banks of the lower Thames Estuary, and as such plans and strategies related to the Thames are relevant to plan-making in Castle Point. The *South East Inshore Marine Plan*, and any adopted South East Inshore Marine Plan that supersedes it, covers the area below mean high water spring level, from Felixstowe to Dover, including the tidal extent of all rivers such as the River Thames. It is a statutory marine plan prepared under the framework provided by the *Marine and Coastal Access Act 2009* and the *Marine Policy Statement* and provides the strategic approach for decision-making in the marine environment within the South East Inshore Marine area. It sets out a vision for the area to 2041 recognising the role of the Thames as a maritime gateway to the world with numerous ports of local and national significance. The vision also seeks to secure resilience around climate change and bring about improvements to environmental quality in recognition of the significant habitats that exist within the area. The *Vision for the Tidal Thames*, developed by the Port of London Authority in conjunction with stakeholders, meanwhile covers just the river itself and sets out a positive 20-year strategy for the use of the river for trade, for freight, for transport and for sport and recreation, whilst protecting and improving its environmental assets and engaging with adjacent communities. It establishes targets for increasing jobs	Representation 424 Marine Management Organisation Representation 444 Port of London Authority Referenced to EA strategies, as it would have been an oversight to create this section but not reference those documents.

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			in sectors associated with the river, for increasing freight movements including short-shore shipping, promoting increased use of the river for passenger transport and encouraging greater participation in sport on and alongside the river. In terms of the environment, it is intended to achieve this whilst aiming to make the river cleaner. This links into targets for the Thames set out under the requirements of the Water Environment (Water Framework Directive) (England and Wales) Regulations and will bring about biodiversity improvements as a consequence. The *Thames River Basin Management Plan* published by the Environment Agency establishes in more detail the approach being taken to meeting the requirements of these Regulations in the Thames. The Environment Agency has also prepared the *Thames Estuary 2100 Plan* which establishes how flood risk will be managed for the river over the remainder of this Century.	
	7	Paragraph 3.20	The South Essex local authorities of Basildon, Brentwood, Castle Point, Rochford, Southend on Sea, ~~and~~ Thurrock ~~supported by~~ and ECC ~~Essex County Council~~ formed the Association of South Essex Local Authorities (ASELA) in 2017.	Representation 336 ECC
	8	Paragraph 3.23	~~In January 2018, agreement was reached to from the ASELA. Its ambition is to develop a long term place based growth ambition across South Essex. A joint strategic approach will enable the South Essex sub region to collectively support economic growth and respond to external pressures such as the *Thames Estuary 2050 Commission and the London Plan.*~~	Repeats introductory section
	8	Paragraph 3.25	*INSERT A NEW SECTION AFTER PARAGRAPH 3.25 AND RENUMBER REMAINING PARAGRAPHS ACCORDINGLY* South Essex Productivity Programme ASELA also intend to address the broader elements of growth, beyond	Representation 355 ECC

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			planning. This includes supporting a more productive economy. The ASELA Productivity Programme (2019) lays out four programmes that will deliver significant additional economic activity within the area. The ambitions of this set of programmes are rooted in the intention to drive productivity in South Essex whilst ensuring that the people who live there are able to both contribute to and benefit from that growth. 1. Vibrant places 2. Enterprise growth 3. Future work 4. Data transformation	
	8	Paragraph 3.26	*INSERT A NEW PARAGRAPH AFTER PARAGRAPH 3.26 AND RENUMBER REMAINING PARAGRAPHS ACCORDINGLY* The Vision of the Green Grid Strategy remains relevant today, and under the auspices of ASELA, a *Green and Blue Infrastructure Strategy* has been developed to deliver high quality green and blue infrastructure across the area as part of both Local Plans and the emerging Joint Strategic Plan. A key component of this strategy is the creation of an estuary park which integrates with existing and proposed communities within South Essex to enhance wildlife and the connectivity of habitats and provide wider opportunities for access and recreation for residents and visitors.	Representation 337 ECC – sought reference to Essex Green Infrastructure Strategy
AM6	10	Paragraph 4.9	Whilst the level of bus service provision on Canvey Island reaches up to 20 buses per hour in the peak, the ~~Canvey~~ Island is peripheral to the public transport network resulting in long journey times. ~~and~~ ~~t~~Therefore many residents rely on the private car…	Representation 338 ECC
	11	Paragraph 4.12	Canvey Island has ~~a~~ two port facilities,~~y serving~~ namely the Oikos and Calor Gas ~~fuel storage and distribution~~ facilities. Both are registered as ~~top~~ upper tier Control of	Representation 691 Oikos

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			Major Accident Hazards (COMAH) ~~Hazardous~~ Installations. These facilities are the receptors of fuel products entering the UK and are of national significance. Due to their proximity to the resident population ~~they~~ there are ~~a~~ certain constraints on development within ~~designated areas~~ defined consultation zones around these sites.	
	11	Paragraph 4.13	*AMEND THE SUB-HEADING ABOVE PARAGRAPH 4.13* South Benfleet, Hadleigh and Thundersley	Consistency within chapter
	11	Paragraph 4.15	Compared with Canvey Island, South Benfleet, Hadleigh and Thundersley are relatively less deprived, with some pockets of significant wealth…	Consistency within chapter
AM7	13	Paragraph 5.10	The proportion of people over the age of 65 is expected to increase from ~~21.5%~~ 25% in ~~2011~~ 2018 to ~~34% in 2031~~ 27% in 2033. A population that includes a higher proportion of older people will need a different mix of services compared to that evident in the borough today. There will be a need for more specialist accommodation to be provided as the number of elderly people increases.	Factual update arising from SHMA Addendum 2020
	13	Paragraph 5.11	In the absence of the housing growth set out within this plan ~~It is~~ it would be expected that there ~~will~~ would be an increasing level of vacant school places, whilst pressure on healthcare services, social services and daytime clubs and leisure facilities ~~will~~ would grow.	Representation 339 ECC
	13	Paragraph 5.20	5.20 Sea-level rises are expected to increase the risk of flooding in low lying areas. The *TE2100 Plan* identifies Canvey Island as a policy P4 area. Policy P4 states that there is a need to 'take further action to keep up with climate and land use change so that flood risk does not increase'. To this end, recommendations 6,7 and 11 for action zone 7, in which Canvey Island is located, seeks to maintain, enhance, improve or replace the river defence walls and active structures throughout	Representation 241 Environment Agency

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			the period to 2100.. ~~Makes provision for increasing the height of and strengthening of the Canvey Island tidal flood defences before the end of the century in order to ensure that they continue to provide the maximum level of protection.~~	
AM8	17	Paragraph 8.2	…It has carried out a *Strategic Housing Land Availability Assessment (SHLAA)* each year since 2011, all of which have taken a forensic approach in examining all potential sites regardless of size, particularly in the built~~-~~ up area, to ensure that all opportunities are identified.	Typo
	17	Paragraph 8.4	However, to meeting housing need, the Council's strategy is to promote development with both existing urban areas and through limited urban extensions. The la~~e~~tter involves the re-designation of land identified as Green Belt in the 1998 Local Plan. The Council is committed to ensuring that opportunities to make greater use of the Green Belt are explored by improving accessibility without destroying its intrinsic open and attractive character.	Typo
	17	Paragraph 8.6	The Plan acknowledges that there is a limited urban capacity within the Borough. Castle Point is typified by suburban residential development around Hadleigh, South Benfleet and Thundersley (the 'Mainland'). Intensifying development…	Consistency within chapter
AM9	19	Paragraph 8.14	The Council will have regard to Essex County Council's ~~(~~ECC) published *Developers Guide to Infrastructure Contributions ~~2016~~*. ~~Essex County Council~~ ECC plays an important role as an infrastructure provider in Castle Point and the guide sets out what the likely infrastructure requirements for matters such as schools and transport could be.	Representation 344 ECC
	19	Paragraph 8.15	The infrastructure delivery mechanisms will be identified through the master planning or ~~planning~~ development briefs. However, in order to ensure that	Consistency with other changes within the Plan

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			appropriate infrastructure is in place to serve the development needs identified in this plan, planning obligations will be sought.	
AM10	23	Paragraph 9.16	The table below, sets out the indicative housing trajectory for the strategic allocations and other sources of supply. This trajectory will be monitored and maintained as ~~is~~ a live document and will be updated to take account of market conditions and to ensure that there is a sufficient supply during the plan period to meet the ~~housing targets and achieve a five year supply of housing~~ requirement for housing.	Clarification
AM11	29	Paragraph 9.37	The Council's policy will do all it can to meet need, whilst maintaining viability and in accordance with the NPPF affordable housing will only be sought for proposals of 10 units or more. Although the Council is significantly increasing the provision of affordable housing through this Plan, it does not meet the recommendation in the SHMA of 110%. It is necessary to seek a mix of affordable housing provision that best meets the needs of the community, including social housing provision.	Moved from elsewhere in reasoned justification to improve readability
	29	Paragraph 9.44	… The quantum of affordable housing on such sites can affect viability. Viability evidence shows that market values are lower on Canvey Island than in South Benfleet, Hadleigh and Thundersley. This affects the viability of development and the ability to seek contributions to pay for infrastructure requirements.	Clarification
AM12	33	Paragraph 9.61	The need for Gypsy, Traveller and Travelling Showpeople accommodation, is identified in the ~~2018~~ Castle Point Borough Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2017 ~~and Traveller Local Needs Accommodation Assessment (CPLNAA)~~. This has been prepared in accordance with the Planning Policy for Traveller Sites and the Housing and Planning Act 2016, and forecasts the needs for Gypsies, Travellers and	Correction of evidence document name

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			Travelling Showpeople in the Borough to 2034.	
	33	Paragraph 9.62	Due to the different requirements of the *PPTS* and the Housing and Planning Act 2016, the ~~CPLNAA~~ *Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2017* identifies two groups of Gypsies, Travellers and Travelling Showpeople, depending on whether they meet the 'planning definition':	Correction of evidence document name
	34	Paragraph 9.63	Through the Essex Planning Officers Association, the Essex authorities have prepared a Greater Essex Gypsy, Traveller and Travelling Showpeople ~~and Traveller~~ Accommodation Assessment 2018 into which the findings of the Castle Point Borough Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2017 ~~LNAA~~ have been integrated. At this time, it has not been possible to robustly assess the need for transit sites in Essex, with data on unauthorised encampments collected to date insufficient to establish a requirement. Changes have been made to the data collection process, but it will not be possible to undertake an assessment until 2020/21 at the earliest. Should that assessment identify the need for a transit site within the Borough in the future, this will need to be considered through the next review of the Local Plan.	Correction of evidence document name
	34	Policy HO7 Title	Gypsy and Traveller ~~p~~Provision	Formatting
AM13	37	Paragraph 10.7	… The major highway improvements which would be required to support development at North West Thundersley are yet to secure funding, although initial discussions have taken place between Essex County Council (ECC) as the Highway's Authority, landowners and developers.	Clarification of acronym
	37	Paragraph 10.8	Furthermore, the government's commitment to the Lower Thames Crossing, which is to be built during the period of this Plan, will have a significant impact on the strategic highway network (A13, A127, A130). ~~Essex County Council~~ ECC have advised that	Consistency within Plan

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			further development which affects the network will not be supported until funding for the A127/A130 Fairglen Interchange is committed and in place.	
	39	Policy HO9 Title	Land west of Benfleet, Benfleet	Clarification and consistency with other allocations
AM14	48	Paragraph 10.48	The front of the site sits within an existing residential street scene, which exhibits elements of the Boulevard urban design approach, with tree lined grass verges along its length, and properties on wider plots. Such an approach should be used within the design of the frontage of this development to integrate it into the immediate surroundings. This overall approach is likely to result in a capacity of approximately 55 homes on this site. Access ~~form~~ from Scrub Lane to the school by way of a footpath should be provided.	Correction of a typo
AM15	51	Policy HO18 Sub-heading	Land north of Grasmere Road and Borrowdale	Correction of a typo
AM16	57	Paragraph 10.81	The site is adjacent to residential developments, as well as a school, so development should ensure high quality linkages to these neighbouring areas, as well as through the site itself. Boulevards and greenways which integrate green infrastructure can enable such linkages to occur and should form part of the overall design concept for the site, particularly for the main routes through and within the site. The entrance to the site lends itself to be designed using elements of the Major Entry Point urban design approach. To reduce the impact on the local highway network a footpath from the site to Somnes Avenue, through land to the north of the site, should be made available for community uses. This should be ~~provide~~ providing a pedestrian and cycle way towards Benfleet station, providing a safer alternative to Canvey Road.	Correction of a grammar
AM17	65	Paragraph 10.105	The *SHLAA 2018* estimates the site has capacity for 32 new residential dwellings. The site has a resolution to grant outline permission for 32 dwellings, but the Section 106	Clarification

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			Agreements has not been completed and no decision notice issued.	
AM18	71	Paragraph 11.6	The consequence of these weaknesses in Castle Point is a low level of business output at present. As a key measure of productivity gross value added (GVA) per head in Castle Point is low, ~~with the area ranking in the bottom 40% of districts nationally. In 2014, GVA per head in Castle Point was £12,996.70, this is almost~~ siting at around half of the GVA experienced in the neighbouring authority of Basildon. Due to low local wages, many of Castle Point's residents commute out of the borough for work. 19% commute to London, whilst 12.7% and 14.7% commute to the local centres of Basildon and Southend-on-Sea respectively.	Stats removed to help improve longevity of the plan.
	71	Paragraph 11.7	Modelling was undertaken in the *South Essex EDNA 2017* to determine the existing supply of, and future demand for employment land and space. Castle Point's employment land supply comprises six active employment sites totalling 79 hectares and three potential employment sites totalling ~~22~~ 24 hectares, providing 103 hectares in total. The six existing sites identified are:…	Mathematical correction
	72	Paragraph 11.11	The Castle Point Regeneration Partnership is in place to address some of the issues mentioned above. Around the environmental quality of the estates, new gateways and signage has already been delivered at Charfleets Industrial Estate and Manor Trading Estate. However, there remains an issue with the quality of the private realm in these areas. With regard to training meanwhile, ~~two new secondary schools and a Skills Campus to deliver further education courses~~ there has been significant investment in the South Essex College PROCAT Skills Campus ~~have been delivered~~ on Canvey Island over the last ten years to improve the standard of opportunity there.	Representation 377 ECC
AM19	81	Paragraph 12.6	Whilst retaining their retail function it is vital to maintain town centres as a	Improves readability

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			place to visit and provide identity to an area, policies in this plan aim to focus retail development to the core of town centres but diversify elsewhere if new development contributes to the overall vitality and diversity of the town centre. This provides the scope for the town centres to adapt whilst maintaining a clearly defined core retail function.	
AM20	89	Policy TC6 Sub-heading	Fast Food Outlets	Consistency with policy name elsewhere
	89	Paragraph 12.36	Hot food takeaways can contribute towards unhealthy lifestyles. ~~Research shows~~ Public Health England has advised that increased exposure and opportunity to buy fast food (including proximity and opening hours) results in increased consumption levels which can have negative effects on health. This is because some hot food takeaways offer energy-dense food with high levels of saturated fat, sugar, salt and preservatives which are linked to obesity and related health conditions.	Clarification on source
		Paragraph 12.42	Children are increasingly more vulnerable to obesity than~~t~~ adults. Whilst there is a range of reasons – poor diet at home, lack of exercise or sedentary lifestyles – the access to fast food takeaways is of concern. Restricting access close to schools will assist to discourage children from unhealthy eating and assist in controlling obesity.	Correction of a typo
AM21	93	Paragraph 13.11	The *Castle Point Borough Open Space Appraisal Update 2012* assessed the current and future needs for different types of open space provision. This study has informed the ~~*Infrastructure Delivery Plan (IDP)*~~ which highlights the future locations of future requirements for different types of open spaces…..	Consistency of formatting
	94	Paragraph 13.16	One of the action points in the *Essex Joint Health and Wellbeing Strategy 2018-2022* (and successor documents) ~~action points~~ is to reduce the numbers of people becoming dependant on health and adult social care by facilitating the best conditions for carers	Representation 384 ECC

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			to operate. This includes increasing the proportion of carers who find it easy to find information about support.	
	94	Paragraph 13.17	Since 2008 the Essex Planning Policy Officers Association has provided guidance on the preparation, submission and consideration of health through new developments. This is ~~now~~ set out in advice and best practice published by Public Health England and locally in the Essex Planning Officers' Association (EPOA) HIA Guidance Note – Essex Healthy Places – Advice Notes for Planners, Developers and Designers (or successor documents), which can be viewed via the Essex Design Guide website. ~~the *Health Impact Assessment Guidance 2008*~~. This seeks development of more than 50 residential units or 1,000 sqm, that a Health Impact Assessment is undertaken by the applicant. This assessment will identify any adverse impacts from the development. Options to mitigate these impacts can be considered and amendments made to a proposal or provision made to enable the application to be acceptable, through a Section 106 Agreement. A screening process will take place to determine the extent and detail/complexity of HIA required based on the type of development proposed and whether evidence demonstrates the development impacts can be expected to be significant on sensitive receptors.	Representation 385 ECC Also in response to MIQ 285 and MM116 from ECC to the main modification's consultation.
AM22	96	Paragraph 13.23	Locally, the Health and Wellbeing Partnership aim to increase adult physical activity in the borough, ~~;~~ which has been identified as an issue in the borough.	Formatting error
AM23	98	Paragraph 13.35	…. The ~~*Castle Point Borough Infrastructure Delivery Plan*~~ *IDP* outlines the additional green infrastructure which should be provided alongside new development in the Borough. This will be funded through a combination of Section 106 Agreements, Community Infrastructure Levy and grants or capital programmes.	Consistency of formatting

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
	99	Paragraph 13.36	The Canvey Wick Nature Reserve on Canvey Island will provide additional open space in the Borough and will create new walking and cycling trails extended to the south west of Canvey Island, better linking the existing 'round Island' network of footpaths and cycle ways. This network of footpaths and cycle ways will shortly be incorporated into the England Coast Path.	Factual update
AM24	100	Paragraph 13.41	~~Essex County Council (~~ECC~~)~~ as the Education Authority has the responsibility for early years and school place planning. ~~Through this process~~ ECC identifies the need for school places and identifies surpluses or deficits through a ~~10~~ Ten *Year Plan Meeting Demand for School Places in Essex ~~(2019-2028~~).* Places for early years and childcare ~~as~~ are assessed through a provider termly headcount and published annually ~~and forecast, through a 5 year Plan~~. This informs the service on the need for additional sustainable, high quality early years and childcare provision that meets the needs of the community.	Representation 390 ECC
	101	Paragraph 13.46	The Essex Early Years and Childcare service ~~report a likely increase in the demand for the provision of spaces in nurseries and pre schools~~ has reported an increase in the demand for the provision of spaces as the Extended Funding Entitlement (EFE) changes took effect in September 2017~~ which now enables families to~~. The EFE enables eligible working families to access up to an additional free 15 hours for 3-4-year olds; and this has placed a further need for full day care and wrap around provision within the Borough.	Representation 391 ECC
	101	Paragraph 13.47	~~Essex County Council provides data for Early Years and Childcare. Their 2018 data found that except for South Benfleet all areas in Castle Point have an average cost per term less than £2,905 with the majority of Canvey Island being less than £1,375 per term.~~ The borough appears to have a variety of ~~relatively good supply with most areas having~~ vacancies for 2, 3 and 4-year olds. However, there is a need for	Representation 392 ECC

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			new provision arising from the proposed level of growth and to enable working families to access appropriate and high-quality childcare. ~~d~~Details of the new provision is set out within the respective developments.	
	102	Paragraph 13.51	*INSERT A NEW PARAGRAPH AFTER PARAGRAPH 13.51 AND RENUMBER ALL PARAGRAPHS THEREAFTER ACCORDINGLY* Whilst schools in Castle Point primarily meet local needs, there are cross-boundary flows of pupils. Principally, some children from Basildon borough and Southend-on-Sea borough attend secondary schools in Benfleet, whilst some children from Castle Point attend the grammar schools in Southend. The two special educational needs schools meanwhile serve an area wider than Castle Point. These cross-boundary flows have been accounted for when determining additional need arising from the growth in this plan.	Representation 236 Southend-on-Sea Borough Council
	102	Paragraph 13.52	~~Essex County Council~~ ECC has a duty to secure sufficient, suitable education and training provision for all young people in their area who are over compulsory school age but under 19 or aged 19 to 25 and for whom an Education, Health and Care (EHC) plan is maintained…..	Consistency of formatting
	102	Paragraph 13.53	There are currently four locations providing post-16 education provision in Castle Point. USP (SEEVIC) college, located in Thundersley, with a further campus in Thurrock, is the largest provider in the Borough offering a range of academic, high education and vocational courses. The King John School and Appleton School, in Thundersley and Benfleet, have sixth forms which also offer a range of academic and vocational courses for a smaller number of students. Finally, the Canvey Skills Campus, which opened to students in 2013, offers a range of vocational courses in conjunction with partner Colleges in South Essex. Some people meanwhile travel out of the borough for further education, with South Essex College	Representation 236 Southend-on-Sea Borough Council

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			having locations in Basildon and Southend town centres.	
	102	Paragraph 13.56	… ~~Essex County Council~~ ECC have increased the profile of Adult Community Learning in both supporting the economy, and in providing opportunities for people to learn new skills….	Consistency of formatting
	103	Paragraph 13.58	The Council will work closely with ~~Essex County Council~~ ECC to ensure as wide a coverage of libraries for residents.	Consistency of formatting
	103	Policy HS4 Part 1	The Council will work with ~~Essex County Council~~ ECC and other education and skills development providers to provide new….	Consistency of formatting
AM25	104	Paragraph 13.61	…In April 2013 the NHS transferred the responsibility of public health to the County Council. ~~Essex County Council~~ ECC therefore have a statutory duty to 'improve the health of their local populations'….	Consistency of formatting
	104	Paragraph 13.62	The provision and commissioning of primary and secondary healthcare services is the responsibility of ~~NHS England in liaison with~~ the Clinical Commissioning Group (CCG) in liaison with NHS England and NHS Improvement. The Castle Point and Rochford CCG maintain a strategy for the delivery of high-quality healthcare services within the area. Hospital provision is outside the borough, with principal locations in Basildon, Chelmsford and Southend. These hospitals are part of the Mid & South Essex University Hospitals Group offering a breadth of acute and specialist services.	Representation 682 NHS
	104	Paragraph 13.63	~~Essex County Council~~ ECC are responsible for social care provision in Essex…	Consistency of formatting
AM26	110	Paragraph 14.4	Within South Essex, there are three Local Transport Authorities - Essex County Council (ECC), Southend-on-Sea Borough Council Unitary Authority and Thurrock Council Unitary Authority….	Consistency of formatting

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
	110	Paragraph 14.5	Castle Point sits within the heart of the South Essex sub-area, and as a consequence suffers from congestion at peak times. Several routes within and nearby Castle Point operate at capacity, and it is common for a single incident within the network to cause excessive journey times within Castle Point and neighbouring authorities. The Castle Point Transport Evidence Refresh 2019, undertook modelling of peak time traffic flows in Castle Point having regard to, 17 key junctions across the Borough. This indicates that currently some junctions operate at, or over capacity. By 2033, it is expected that more of these junctions will exceed capacity, unless improvements are delivered to the highway network, and more sustainable modes of travel are encouraged.	Statement of Common Ground SCG-009 Southend-on-Sea Borough Council
	111	Paragraph 14.8	The Plan supports sustainable transport modes in order to help reduce congestion on the highway network. ~~Essex County Council~~ ECC has published a Sustainable Modes of Travel Strategy as well as the ~~Essex County Council~~ ECC Cycle Strategy 2016 and the Castle Point Borough Cycling Action Plan 2018~~7~~, which both sets out where the county council is aiming to improve sustainable transport infrastructure.	Consistency of formatting
AM27	112	Policy TP2 Sub-heading	Improvements and Alterations to ~~Roads~~ Highway Infrastructure	Representation 398 ECC
AM28	118	Policy TP3 Sub-heading	Improvements to ~~Footpaths, Bridleways and Cycling~~ Active Travel Infrastructure	Representation 410 ECC
AM29	118	Paragraph 14.16	The *Essex Local Transport Plan* meanwhile seeks to promote active and sustainable travel, by amongst other things providing the infrastructure for sustainable travel and promoting the use of travel plans. With regard to cycling, the *Essex Local Transport Plan* considers actions to improve access for cyclists and pedestrians in particular,	Representation 410 ECC

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			and identifies the following improvements as essential:…	
AM30	120	Paragraph 14.30	In terms of bus service provision, ~~T~~the following public transport improvements are proposed by the *Essex Local Transport Plan 2011* in relation to Castle Point.	Change to clarify that the Local Transport Plan does not cover trains.
AM31	121	Paragraph 14.34	The Essex Local Transport Plan (2011), amongst other things seeks a reduction in greenhouse gas emissions and also prioritises the improvement of journey times on key routes passing through Castle Point including the A130, A13 and A129 as key priorities for the South Essex sub-area. The capacity improvements are supported by the Thames Gateway South Essex Planning and Transport Strategy.	Clarity of document
AM32	123	Paragraph 14.44	~~Essex County Council~~ ECC are working with schools to assist with the development of School Travel Plans.	Consistency of formatting
AM33	127	Paragraph 15.1	… ~~Ministry for Housing, Communities and Local Government (MHLCLG), along with the Department for Culture, Media and Sport (DCMS)~~ The Government has confirmed that telecommunications infrastructure should be considered alongside other key infrastructure such as roads and utilities.	Factual update
	127	Paragraph 15.5	Essex County Council (ECC) has adopted *21st Century Digital Essex (2011),* the County Strategy for delivering world-class broadband in Essex, which aims to increase the amount of homes and businesses that have high quality telecommunications available to them.	Consistency of formatting
AM34	134	Paragraph 16.25	There are sustainability benefits from the provision of landscaping. It can form an integral part of Sustainable Drainage Systems (SuDS), including the use of green roofs on buildings and water features at individual buildings or running through larger sites. Details on the design and adoption of SuDS can be found in the published ~~*Essex*~~ *ECC Sustainable Drainage Systems Design Guide* ~~*and Adoption Guidance 2016*~~*.*	Representation 417 ECC

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
AM35	140	Paragraph 17.6 Bullet Points 1 and 2	• make~~s~~ as much use as possible of suitable brownfield sites and underutilised land; • optimise~~s~~ the density of development, including whether policies promote a significant uplift in minimum density standards in town centres and other locations well served by public transport	Correction of grammar
	140	Paragraph 17.9	How the Council has dealt with its long-term boundaries is set out in paragraphs 10.5~~4~~ to 10.11~~0~~ of this Plan.	Clarification of updated paragraph numbers
AM36	156	Paragraph 18.12	In recent years there has been a rise in extreme weather events including high levels of precipitation, which can put strain on existing watercourses and drainage systems. The different sources of flooding include tidal, fluvial (e.g. rivers), surface water, groundwater and reservoir flooding, and are managed by different bodies. The Environment Agency is responsible for tidal, reservoirs and fluvial flooding from main rivers and Essex County Council (ECC), as the Lead Local Flood Authority (LLFA), is responsible for reducing the risk of flooding from surface water, groundwater and ordinary watercourses in the borough.	Consistency of formatting
	156	Paragraph 18.13	Canvey Island is identified as being within Flood Zone 3a. It is defended by sea defences which are currently effective in managing the current tidal flood risk to the Island. However, the *South Essex Strategic Flood Risk Assessment 2018 (SFRA)* identifies that future impacts of climate change require these defences to be improved to take account of the possibility of over topping from an extremely high tide. The *Thames Estuary 2100 Plan (TE2100 Plan)* identified Canvey Island as being subject to Policy P4 (of the 2100 Plan), which requires further action to be taken to keep up with climate and land use change so that flood risk does not increase.	Correction of a typo
	157	Paragraph 18.16	~~Essex County Council~~ ECC hosts an online Interactive Flood and Water Management Map, which identifies the locations in the borough that are at risk from surface water flooding (low,	Consistency of formatting

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			medium or high risk), areas located within Critical Drainage Areas (CDAs), and locations where schemes in the capital programme are being progressed….	
AM37	161	Paragraph 18.33	The NPPF requires that strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources. They should consider cumulative impacts in or affecting local areas susceptible to flooding and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as ~~Essex County Council~~ ECC as Lead Local Flood authority and internal drainage boards.	Consistency of formatting
	162	Paragraph 18.36	The surface water flood risk across the borough shown on the ~~*Essex County Council*~~ *ECC Interactive Flood and Water Management Map*, excluding Canvey Island, is driven predominantly by topography relating to watercourse channels of Benfleet Creek….	Consistency of formatting
	162	Paragraph 18.39	~~Essex County Councils~~ EECs Interactive Flood and Water Management Map identifies Critical Drainage Areas (CDAs), these are areas notified to the local planning authority by ECC, the Lead Local Flood Authority ~~the Environment Agency~~ with a high risk of flooding which have critical drainage problems, this can affect people, property or infrastructure….	Consistency of formatting and in response to MMC118 from ECC to the main modification's consultation.
	163	18.42	A single integrated urban drainage model (IUD) has been prepared to enhance the understanding of the drainage network, and associated flood risk on Canvey Island. This collaborative work between risk management authorities (the Environment Agency, Anglian Water and ~~Essex County Council~~ ECC) has provided a detailed representation of the drainage network on Canvey Island. This has been used to update the Environment Agency's *Risk of Flooding from Surface Water Map*.	Consistency of formatting

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
	164	18.48	Reference should be made to the ~~Essex County Councils~~ EEC SuDS Guidance when submitting an application for development, in order to accord with the Lead Local Flood Authority criteria.	Consistency of formatting
AM38	171	Paragraph 19.11	The *Castle Point Open Space Appraisal 2012* identifies existing networks of green spaces and green corridors within the borough that are used for informal recreation and transport as well as acting as biodiversity networks. *The Open Space Appraisal,* along with more recent work on the *South Essex Green and Blue Infrastructure Study* indicates that ~~T~~there are ~~also~~ clear opportunities to enhance these networks through improving the accessibility of these spaces, providing new spaces and the creation of additional green corridors throughout the borough.	Clarification of evidence
AM39	182	Paragraph 19.61	~~Essex County Council~~ ECC are also looking to improve air quality along the A127 ~~at key junctions~~ with the *A127 Air Quality Management Plan*.	Consistency of formatting
AM40	186	Paragraph 19.79	The *South Essex Water Cycle Study ~~2011~~ 2012* indicated that there is capacity to accommodate growth at the Canvey WRC and the Benfleet WRC. Anglian Water has also identified that there is sufficient capacity within the Southend WRC to accommodate growth in Southend and those parts of Castle Point and Rochford served by the works. However, the Study advised the removal of surface water from these combined systems would assist with additional capacity and help to prevent storm discharges into the Thames and Crouch Estuaries. Such discharges have the potential to cause harm to European sites in both estuaries, as well as influencing targets set out in the Water Framework Directive. Additionally, there are bathing waters and shellfish waters located in the Thames Estuary that may be harmed through any decline in water quality. The potential impacts are therefore economic as well as environmental.	Clarification of document

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
	187	Paragraph 19.80	In order to reduce storm discharges, the *South Essex Water Cycle Study* ~~*2011*~~ *2012* recommended surface water from new development sites, including brownfield, should not drain to the foul/combined network but should be managed on site. This approach to waste water management is supported by Anglian Water.	Clarification of document
	187	Paragraph 19.81	The *South Essex Water Cycle Study* ~~*2011*~~ *2012* indicated new development in the South Essex area is likely to impact on water quality owing to Essex being the driest county in England. This will require mitigation within new development. The study found that it would be preferable to ensure that water efficiency is achieved in new developments, and that SuDS are secured as part of new development proposals in order to minimise impacts on water quality.	Clarification of document
AM41	188	Paragraph 20.5	There are a ~~large amount~~ number of designated and non-designated historic assets within Castle Point. Whilst heritage assets are distributed throughout the Borough, there is a large concentration of listed buildings in the High Street in South Benfleet. This area was designated as the South Benfleet Conservation Area in 1988, and benefits from a *Conservation Area Management Plan.* Florence Gardens has also been designated as a conservation area, taking into account the design, layout, and uniformity cottages in the area.	Reads better
AM42	210	Appendix 5	Scheduled ~~Ancient~~ Monuments (7 instances)	Correction, and in response to MIQ 359
AM43	215	Appendix 6 Glossary	*DELETE REFERENCE TO CASTLE POINT LOCAL NEEDS ACCOMMODATION ASSESSMENT (CPLNAA)*	Factual amendment
	218	Appendix 6 Glossary	*DELETE REFERENCE TO MARINE CONSERVATION ZONE*	Representation 467 Port of London Authority – previous proposals for a MCZ did not get agreed.

Additional Modifications Post Consultation

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
	5	3.7	In accordance with the *NPPF*, Local Plans should create a vision for the future of the borough and a positive framework for addressing housing, economic, social and environmental priorities. In particular, they should include strategic policies to deliver: • An overall strategy for the pattern and scale of development; • The homes and workplaces needed, including affordable housing; • Appropriate retail, leisure and other commercial development; • Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); • Community facilities (such as health, education and cultural infrastructure); and • Climate change mitigation and adaption, and ~~Conservation and enhancement of the natural, built and historic environment, including landscape and green infrastructure.~~	To aid comprehension

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			• Conservation and enhancement of the natural, built and historic environment, including landscape and green infrastructure.	
	7	3.16	ECC is the waste planning authority for the borough, and is responsible for preparing planning policies, and for assessing applications for waste management development. The *Essex and Southend-on-Sea Waste Local Plan (2017)* is a statutory Plan which should be read alongside the New Local Plan. It sets out where and how waste management developments can occur and is the planning policy against which waste management development planning applications are assessed ~~against~~.	To remove duplication
	11	4.13	These towns sit on the mainland between settlements in Basildon and Southend boroughs and have a combined population of 48,000 people. Included within the landscape ~~is~~ are several ancient woodland and grassland systems including three sites of SSSIs and the Benfleet and Southend Marshes SPA/Ramsar site, important for its assemblage of migratory bird species. Due to its elevated topography, tidal flood risk is less of an issue in Hadleigh and Thundersley compared to Canvey, although there are some low-lying areas still at risk in South Benfleet. Surface water flood risk however presents a more significant issue, particularly in parts of South Benfleet and Thundersley.	To correct grammatical error
	12	5.1	The Local Plan will consider impacts or changes that are likely to occur within the borough over the plan period and ~~beyond in~~ beyond. In order to do so a number of key drivers are set out below.	To improve readability
	12	5.2	The Government is pursuing an economic growth agenda in order to ensure that Britain has an innovative and open economy. Local Plans are expected to help create conditions in which businesses can invest, expand and adapt. Boosting the economy and increasing productivity are ~~a~~	To correct grammatical error

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			major drivers for change in the emerging South Essex Plan and clearly laid out in the Statement of Common Ground agreed by the Association of South Essex Authorities (ASELA).	
	12	5.4	There are four town centres – Canvey, Hadleigh, Tarpots and South Benfleet. Each ~~are~~ is convenience shopping focussed with a high level of independent stores. The Council purchased the Knightswick Shopping Centre in Canvey town centre in 2019 to support regeneration of that town centre. There is a limited retail offer by national multiples with larger scale comparison shopping needs being met at sub-regional centres such as Basildon, Southend, Lakeside and Chelmsford.	To correct grammatical error
	12	5.7	To improve connectivity the Council is participating in the ~~role~~ roll out of a local full fibre network across the Borough initially connecting key public buildings and facilities – council buildings, health, CCTV, care homes, education and blue light services. This government funded project aims to increase business connectivity into the full fibre network.	Typographical error
	13	5.15	There is strong loyalty to local services and town centres. This plan seeks to support their development and long-term, sustainability~~.~~ should be enhanced and protected as appropriate. Canvey and Hadleigh Town Centre Master Plans are tools which will enable this to occur.	Typographical error
	17	8.3	This Plan sets out how the identified needs of the ~~District~~ borough can be met. Employment need is met through the two new employment zones on Canvey Island – Thames View 130 and Gateway 130, plus redevelopment and reuse of other existing employment areas and the regeneration of the town centres, particularly in Hadleigh and Canvey Island, where regeneration plans are being implemented.	Factual correction
	17	8.4	However, in meeting housing need, the Council's strategy is to promote development ~~with~~ within both existing urban areas and through limited urban extensions. The latter involves the re-	Typographical error

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			designation of land identified as Green Belt in the 1998 Local Plan. The Council is committed to ensuring that opportunities to make greater use of the Green Belt are explored by improving accessibility without destroying its intrinsic open and attractive character.	
	17	8.7	Canvey ~~island~~ Island is a high-density settlement based on shallow plots with a tight street pattern. Whilst there are several small sites identified in the *SHLAA* which are policy compliant for development, they do not make a significant contribution towards the overall housing need target. It is not therefore possible to secure significant levels of additional growth on Canvey ~~island~~ Island through urban intensification. As on the 'Mainland' the redevelopment of employment areas is not for consideration. Indeed, the main employment growth within the borough will be on Canvey Island and improved access will further extend the status of the Island as a business location.	Typographical error
	19	8.17	This Plan together with the requirements in the *Infrastructure Delivery Plan* have been tested through a *Whole Plan Viability Assessment*. That assessment concluded that the requirements of the plan are viable and therefore, as far as sites allocated in this plan, plus windfall sites which will be subject to Community Infrastructure ~~Levey~~ Levy or as yet unidentified Section 106 Agreements, are viable and deliverable.	Typographical error
	21	9.3	Although the *NPPF* requires local planning authorities to set housing targets on the basis of OAN, this assessment is balanced with the constraints and capacity of the ~~District~~ borough to accommodate the target figure. Where it cannot do so the local authority must demonstrate that the need will be accommodated outside of the borough area.	Factual correction
	32	9.56	It should be noted that Holehaven Caravan Park, Kings Park and Thorney Bay are located within Flood Risk Zone 3 and ~~therefore~~ the policies set out in the *NPPF* and its technical guidance regarding flood risk therefore apply.	To remove repetition
	35	9.67	One of the core planning principles contained within Chapter 12 of the *NPPF* is that planning policy should seek to secure	To reflect revised NNPF

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			high quality design and a good standard of amenity for all existing and future occupants of the land and buildings. Furthermore, paragraph ~~127~~ 130 of the *NPPF* expects local planning authorities to promote designs that encourage health and well-being, and which also have a high standard of amenity not just for the short term but over the lifetime of the development, that are sympathetic to the locality by means of good design.	
	37	10.4	The *NPPF* states in paragraph ~~139~~ 143, that 'when defining Green Belt boundaries, plans should (*inter alia*)…where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period.'	To reflect revised NNPF
	37	10.7	The major barrier to delivery of housing development in this location is twofold: the site is presently significantly constrained by a lack of appropriate access and risks to the strategic network; and the land is within multiple ownership with no commitment yet to bring forward a comprehensive development. The major highway improvements which would be required to support development at North West Thundersley are yet to secure funding, although initial discussions have taken place between Essex County Council (ECC) as the ~~Highway's~~ Highway Authority, landowners and developers	To correct a grammatical error
	38	10.14	The provision of a landscape buffer provides the opportunity to create a strategic greenway running north-south along the eastern boundary, which can incorporate accessible public footpaths and cycleways, linking to existing and proposed footpaths, cycle routes, open spaces, and natural features. It also provides the opportunity to effectively integrate biodiversity into the development through the creation of a community woodland which will also lessen the visual impact of the development. Due to the location of this site, and the scale of development proposed, it will be necessary for the master plan for this site to be accompanied	To correct a grammatical error

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			by a project level Habitats Regulations Assessment which ensures that the detailed proposals do not pose a risk of adverse effects to the integrity of the nearby Benfleet and Southend Marshes SPA. On-site green infrastructure provision within this development is expected to play a significant role in ensuring harm is prevented to this off-site natural asset.	
	38	10.18	The *Transport Evidence for the New Local Plan* indicates that junctions in the proximity of this site already experience congestion issues and are expected to exceed their designed capacity with additional development in the area. The Tarpots junction is an issue in this regard. In order to overcome this issue, a new access and egress onto the A130 Canvey Way from this site will need to be provided as part of this development within the land of the highway authority and the landowner. This junction will need to take the form of a roundabout with a segregated northbound carriageway for existing traffic from Canvey Island. The provision of this access should also be ~~complimented~~ complemented with the dualling of Canvey Way from Sadlers Farm to the new junction in order to facilitate congestion relief and improve traffic flows.	Typographical error
	40	10.24	It will also be necessary to demonstrate integration of sustainable drainage techniques, as the site is identified as being in a Critical Drainage Area, in order to ensure that surface water is managed appropriately ~~in order~~ to prevent flooding of properties on or nearby the site. This can be achieved through the provision of open space and Green Infrastructure that will also provide benefits in terms of recreation, nature conservation and active travel.	To improve readability
	44	10.36	Due to the size of the site, its varying landscape and neighbouring land uses there is the opportunity to integrate several different urban design approaches. The 'Arcadia' approach is considered appropriate for the areas of the site located within the Historic Natural Landscape and in the vicinity of important landscape features	To correct a grammatical error

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			within the site, with the Boulevard approach being appropriate for the main routes through the site. Any entrances to this site lend themselves to being designed using elements of the Major Entry Point urban design approach. It is considered with these main urban design approaches setting the framework for the site, the remainder of development could result from a combination of the other urban design approaches set out in Appendix Two. All approaches should be linked together by public open spaces, and greenways which provide multi-user access and connect to the wider network. Having regard to these design ~~approach~~ approaches, it is considered that approximately 455 homes could be accommodated across the whole site.	
	54	10.71	Local junction and highway improvements should be delivered in order to ensure that the site is accessible and that impacts on the existing highway network are minimised. Land to the south of The Chase should be ~~access~~ accessed via Kiln Road, with land to the north of The Chase accessed via Runnymede Chase or Rayleigh Road. The *Transport Evidence for the New Local Plan* indicated the need for improvements to junctions near this site including those on Kenneth Road. Additionally, there is need for improvements to public transport near to this site in order to encourage sustainable transport services and facilities movements.	Typographical error
	68	10.112	This site is approximately 1.9ha in size and was designated as Green Belt in the 1998 Adopted Local Plan. The site sits to the eastern edge of Kings Park Village which houses park homes. To the north lie the Benfleet and Southend Marshes Ramsar and Special Protection Area and Hadleigh Marshes SSSI which are of national and international importance.	To correct grammatical error
	69	10.114	This site is approximately 0.3ha within Hadleigh town centre. The *SHLAA 2018* found this site to be unavailable due to multiple landownership issues. After further investigation the majority of the land is available, however one of the current flats within the existing unit has an unregistered landowner, which affects the sites ability to come forward. In order to maximise the	To correct grammatical error

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			amount of housing within the existing urban area and reduce ~~reducing~~ the need to look further for undeveloped land, the Council has identified this site as an opportunity for the later stage of the plan period. This will enable the Council to resolve landownership issues and bring forward this site in a sufficient time period.	
	82	12.12	Due to the increase of online shopping and a change in consumer habits, town centres now have a reduced demand for traditional retail space. Commercial leisure such as cafes, bars, restaurants, health and fitness, children's play areas, personal services and cinemas will constitute a growing share of town centre floorspace. Many retailers have reduced their numbers of smaller less profitable stores, generally found in small-medium sized towns such as Hadleigh and Canvey town centres~~,~~ and focus~~ed~~ on larger centres like Southend and Basildon.	Typographical error
	90	12.38	Whilst local shopping parades are a sustainable location for hot food takeaways because they are close to where people live, there are, in some instances where the number of takeaways in such parades dominates ~~over~~ use class E(a) shopping provision, reducing the diversity of local retail available.	Typographical error
	93	13.11	The *Castle Point Borough Open Space Appraisal Update 2012* assessed the current and future needs for different types of open space provision. This study has informed the *IDP* which highlights the future locations of future requirements for different types of open spaces. The Study identifies issues more in terms of the quality and accessibility of open space provision in Castle Point rather than with the overall quantity which broadly aligns with established targets for such provision. Areas of improvement were the provision of more formal parks and gardens, which may be popular amongst older people, and the quality of sports facilities, which will have a role to play in encouraging greater physical activity amongst the adult population. Disabled access was also an issue for some areas, which may need to be addressed given the ageing population and increased occurrence	To correct grammatical error

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			of disability and mobility problems that will accompany this growth. An issue with accessibility to children's play spaces was also identified to be addressed which will require increased provision at west and east Canvey, and in Thundersley and Daws Heath ~~to be addressed~~.	
	94	13.16	One of the action points in the *Essex Joint Health and Wellbeing Strategy 2018-2022* **(**and successor documents) is to reduce the numbers of people becoming ~~dependant~~ dependent on health and adult social care by facilitating the best conditions for carers to operate. This includes increasing the proportion of carers who find it easy to find information about support.	Typographical error
	113	13.25	Castle Point has the highest level of obesity amongst the adult population in Essex, and relatively low levels of adult participation in regular physical activity. Compared to the county average Castle Point has a higher level of physical activity in terms of organised sport participation at 39.6% of adults and club membership at 28.1% of adults. Although these levels are higher than the Essex average, it is important that the borough enhances, maintains and where appropriate ~~create~~ creates facilities in order to encourage active lifestyles.	Typographical error
	149	16.17	The *Castle Point Residential Design Guidance Supplementary Planning Document (SPD)* identifies how the following policies in this chapter will be implemented. Further guidance on a broad range of design matters can also be found in ~~T~~the *Essex Design Guide*, which supports the delivery of high-quality development that meets the needs of existing and future communities in Essex. A Quality ~~design~~ Design Panel has been established, with panellists drawn from a range of built environment professions to ~~and~~ provide an independent view on development schemes across Essex and how they may be improved. The Council will support reference to the panel in order to provide a critique of development or make recommendations that improve quality.	Typographical error
	140	17.11	A *Green Belt Review was prepared in 2018 and reviewed in 2019*; Part 1 examined how the borough's Green Belt land contributes to the fundamental aim, characteristics and	To improve readability

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			purposes of the Green Belt as set out by the NPPF. Part 2 assessed a number of sites promoted to the Council for potential housing development in the Green Belt to establish the potential degree of harm that would be manifested on the Green Belt if those sites were allocated for housing.	
	141	17.14	The *Green Belt Topic Paper 2018* concluded that exceptional circumstances exist to allow the release of Green Belt land for residential development in Castle Point. This is drawn from the *Green Belt Review*. The conclusions of Part 2 of the Review establish the harm to the Green Belt from residential development at a number of sites proposed to the Council. The *Housing Sites Options Topic Paper (HSOTP) 2018 outlined* a range of other criteria to establish the suitability and deliverability of these sites for residential development. The *HSOTP* concluded that 14 sites could be released from the Green Belt to meet the needs of sustainable residential development in Castle Point to 2033, ~~T~~the *Sustainability Appraisal* supports the notion that a degree of sustainable Green Belt sites will need to be released in order to meet Objectively Assessed Need (OAN) within the borough, as the amount of urban sites presented through the *SHLAA 2018* evidence would not be enough to support Castle Point's housing needs.	Typographical error
	157	18.17	Increased experience~~s~~ of drought is also likely to be an impact of climate change. The *South Essex Watercycle Study 2012* indicates that water resources in the East of England are likely to become more scarce as a result of climate change. It recommends that consumption in Castle Point is reduced to 105 litres per person per day in order to reduce this deficit.	To correct grammatical error
	162	18.39	*ECC's Interactive Flood and Water Management Map* identifies Critical Drainage Areas (CDAs), these are areas notified to the local planning authority by the Environment Agency with a high risk of flooding which have critical drainage problems, this can affect people, property or infrastructure. There are six defined CDAs in	To correct grammatical error

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			Castle Point covering most of the borough's land area. These are as follows:	
	188	20.7	*Essex County Council's Essex Historic Environment Record (EHER) database* holds records for ~~showing~~ other significant archaeological finds in Castle Point. The records indicate finds dating back to the Palaeolithic, Mesolithic and Neolithic eras, as well as from Anglo Saxon, Romans and Vikings. More recent finds relate to Medieval times and World War Two structures.	Typographical error
	198-203	Appendix 3	Ward Names St George's St James' St Mary's St Peter's Canvey Winter Gardens	Typographical error
	210	Appendix 5 Table 5.5;5.6	~~gunsite~~ gun site	Typographical error
	219	Appendix 6 Glossary Special Area of Conservation	Special Areas of Conservation (SACs) are areas which have been given special protection under the ~~European Unions Habitats Directive~~ Habitats Regulations. They provide increased protection to a variety of animals, plants and habitats and are a vital part of global efforts to conserve world's biodiversity.	Correction to reflect exit from the EU.
	220	Appendix 6 Glossary Special Protection Area	Special Protection Areas (SPAs) are areas which have been identified as being of national and international importance for the breeding, feeding wintering or the migration of rare and vulnerable species of birds. ~~found within European Union countries.~~ They were initially ~~are European designated sites,~~ classified under the EU '*Birds Directive 1979*', and are protected in the UK by the Habitats Regulations.	Correction to reflect exit from the EU

Additional Modifications Post Consultation to New Text

The page numbers and paragraph numbering below refer to the final local plan (March 2022).

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
	21	8.12	To ensure that development positively contributes to the borough by creating beautiful, healthy and sustainable places and spaces consistent with the NPPF, policy SD1 sets out key place making criteria. To	Sentence split to improve readability.

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			support the Plan an Infrastructure Delivery Plan (IDP) has been prepared. This identifies the location, scale, timeframes for delivery and cost of infrastructure required within this Plan. The Council's approach to developer contributions to achieve these place making objectives are set out in strategic policy SD2.	
	45	10.20	The principal access to the site will be from the A130, but the education and medical facilities will need to be accessible from the existing communities to the east. In providing such access from roads to the east, a no-through road shall be created to the A130, however this route will be accessible for public transport and emergency vehicles only. This is to avoid an alternative through-route being created to the detriment of the existing highway network and residential amenity of the area. It is expected that active and sustainable travel infrastructure, facilities and services will be secured alongside the highway improvements, including the provision of a bus service through the site, to which the development will be expected to contribute ~~towards~~.	To avoid repetition
	76	10.112	A significant issue for this site is its proximity to the Calor Gas terminal located on the site's western boundary. Parts of the site ~~falls~~ fall within the Health and Safety Executive consultation zone drawn around this terminal. This would normally preclude any new residential development at this part of the site unless the Health and Safety Executive (HSE) advice were to change in the life of the Plan.	Typographical error
	161	17.30	The Green Belt in the borough is occupied by a diverse range of buildings, uses and activities. Commercial and residential uses have previously been discussed within this Green Belt section. However, there are other forms of development located within the borough's Green Belt, including cemeteries, recreational uses - both formal and informal as well as agricultural, equine and animal husbandry activities (catteries~~y's~~ and kennels).	Typographical error
	161	17.32	Examples within the borough's Green Belt include the provision of commercial kennels, catteries~~y's~~, stables and riding schools, and	Typographical error

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			limited cattle grazing. There are also individual stables located sporadically in the Green Belt, some of which are associated with residential properties.	
	175	18.61	Water demand calculations in the *South Essex WCS 2012* indicate that growth in Castle Point could result in over 1 mega-litres per day (Ml/d) of additional water being needed to meet demand by 2031. This could be reduced if best practice regarding water efficiency is sought from new developments. The *South Essex WCS 2012* recommended water use of 105 litres per person per dwelling (lpppd). It is however recognised that there may be costs associated with achieving this level of water consumption reduction in the short-term.	To explain abbreviation
	183	19.64	The Environment Agency's *Thames River Basin Management Plan* identifies that the lower Thames Estuary is of a moderate quality in terms of its ecological status and is failing to achieve a good chemical status. The plan seeks to raise both of these to `good' by 2027, to meet the requirements of the *Water Framework Directive.* The Water Framework Directive aims to secure no further deterioration of waterbodies and aims to ensure that the status of waterbodies is improved. Whilst the Thames Estuary is the main waterbody in Castle Point to which this applies, it also applies to all other main rivers in the borough ~~also~~.	Typographical error
	198	HE1	1. Development proposals affecting a heritage asset (either designated or non-designated) will be expected to conserve, and where appropriate enhance, the setting of the heritage asset, taking into account the contribution which the setting makes to the character and appearance of the surrounding area and the original function of the asset. 2. When assessing applications for development, there will be a presumption in favour of the conservation and where appropriate enhancement of all heritage assets	Typographical error

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			and their setting. The Council will encourage applicants to put heritage assets to viable and appropriate use, to secure their future conservation and enhancement. 3. Development proposals affecting any heritage asset should demonstrate a comprehensive understanding of its significance. This should include an understanding of the contribution made to that significance by the current setting so that it is clear to decision makers how a change would impact on heritage significance. In assessing the impact of a development proposal on a heritage asset or its setting, the Council will consider: a. The level of any harm or loss; b. The significance of the asset; c. The sustainability, economic and conservation benefits of the assets; and d. The contribution the assets makes to local character and distinctiveness. 4. Development proposals which would cause substantial harm to, or total loss of the significance of, a designated heritage asset will be dealt with in accordance with national policy set out in the NPPF. 5. The effect of a development proposal~~s~~ on the significance of a non-designated heritage asset should be considered in determining the appropriateness of relevant planning applications. Consideration will be given to scale of any harm or	

Ref	Page	Policy/ Paragraph	Additional Modification	Reason for Modification
			loss, against the significance of the heritage asset. 6. Planning permission will be granted for development affecting archaeological sites providing it protects, enhances and preserves sites of archaeological interest and their settings. Where there is a non-designated heritage asset of archaeological interest which is demonstrably of equivalent significance to scheduled monuments, it will be considered in accordance with the requirements for designated assets as set out in part 4 of this policy. In other cases where archaeological heritage assets are known or have the potential to be present, the Council will expect a desk-based assessment and as necessary a field evaluation to have been undertaken and will take into account the archaeological importance of any remains, the need for the development, the likely extent of any harm, and the likelihood of the proposal successfully preserving the archaeological interest of the site in determining any application for development.	
	233	Appendix 7 First line	Policies in this plan will replace in their entirety the 2007 saved policies from the Castle Point Borough Local Plan adopted in 1998.	Typographical error
	236 - 239	Appendix 8 Community Facility	St George's, St Peter's	Typographical error

Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
T: 0333 013 6840
www.placeservices.co.uk
@PlaceServices

07/03/2022

Implications of the Castle Point Borough Council Local Plan Inspector's Report (3rd March 2022) on the Local Plan Sustainability Appraisal (SA)

The Castle Point Borough Council Local Plan Inspector's Report ('the Report') was issued to the Council in March 2022, following a period of examination. The Non-Technical Summary of the Report concludes that the Local Plan provides an appropriate basis for the planning of the Borough, provided that a number of main modifications [MMs] are made to it. Further, the Non-Technical Summary states that:

> *'Following the hearings, the Council prepared a schedule of the proposed modifications and, where necessary, carried out sustainability appraisal and Habitats Regulations Assessment of them. The MMs were subject to public consultation over an eight-week period. In some cases I have amended their detailed wording where necessary.'*

This letter sets out the implications for the Sustainability Appraisal of these additional modifications and their inclusion within the Local Plan at this stage, i.e. since the consultation of the 'schedule of proposed modifications', the amended Local Plan, and its subsequent Sustainability Appraisal.

1.0 The Additional Modifications

1.1 Alongside the Inspector's Report is published the definitive schedule of MMs that are required to make the Local Plan sound in planning terms. The majority of these MMs have been screened and where relevant assessed through the SA process as part of the Main Modifications Consultation (December 2021 to February 2022). For refence these SA consultation documents are listed on the Council's Main Modifications Consultation webpage as those labelled PHD-004 to PHD-010.

1.2 The Inspector's Report highlights a small number of additional modifications to the detailed wording of the MMs where they are necessary for consistency or clarity, as a result of comments received from the eight week consultation on the Main Modifications. The additional modifications at this stage are summarised as:

- MM17 – amended wording to paragraph 10.33 to reflect the recent name change of the nearby Cottage Plantation to Valerie Wells Wood.
- MM40 – amended wording to refer to Nationally Significant Infrastructure Projects rather than Nationally Strategic Infrastructure Projects.
- MM88 – amended wording to include Canvey Island Rugby Club as a community facility under the schedule included within Strategic Policy HS6 Community Facilities.
- MM56 – amended wording within criterion 4 of new Strategic Policy TP3 to delete some wording to be consistent with the Habitats Regulations.

2.0 Implications for the Sustainability Appraisal (documents PHD-004 to PHD-010)

2.1 The Inspector, in their Report, states of the additional modifications at this stage:

> *'None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and SA/HRA that has been undertaken.'*

2.2 Having reviewed the additional modifications, it is agreed that they would not alter or require any subsequent amendment to the Sustainability Appraisal documents PHD-004 to PHD-010 that have been subject to consultation. The additional modifications, by their nature, would not give rise to any additional significant effects on the environment or other themes of sustainability that have not been raised through the SA process to date.

2.3 The additional modifications do not give rise to the need to identify and appraise any new alternative approaches to them, or the wider Local Plan. As such, the additional modifications can be 'screened out' consistent with the approach taken within document PHD-010 Sustainability Appraisal - Annex E - Main Modifications Screening November 2021.

3.0 Summary

3.1 It is considered that the additional modifications outlined in the Inspector's Report (March 2022) can be 'screened out' for any significant effects on the environment and wider sustainability themes . No further iterations of the Sustainability Appraisal Environmental Report are required as a result of the additional modifications to the Local Plan.

Kind Regards,

Jonathan Crane
Principal Planning Consultant
Place Services | Essex County Council

Tel: 03330 136847
Email: jonathan.crane@essex.gov.uk
Web: www.placeservices.co.uk

Place Services
Essex County Council
County Hall Chelmsford
Essex, CM1 1QH
www.placeservices.co.uk
@PlaceServices

Amanda Parrott
Castle Point Borough Council

11th March 2022

By email only

Implications of the Castle Point Borough Council Local Plan Inspector's Report (3rd March 2022) on the Local Plan Habitats Regulations Assessment

Dear Amanda,

The Castle Point Borough Council Local Plan Inspector's Report ('the Report') was issued to the Council in March 2022, following a period of examination. The Non-Technical Summary of the Report concludes that the Local Plan provides an appropriate basis for the planning of the Borough, provided that a number of main modifications [MMs] are made to it. Further, the Non-Technical Summary states that:

> *'Following the hearings, the Council prepared a schedule of the proposed modifications and, where necessary, carried out sustainability appraisal and Habitats Regulations Assessment of them. The MMs were subject to public consultation over an eight-week period. In some cases I have amended their detailed wording where necessary.'*

This letter sets out the implications for the Habitats Regulations Assessment of these additional modifications and their inclusion within the Local Plan at this stage, i.e. since the consultation of the 'schedule of proposed modifications', the amended Local Plan, and its subsequent Habitats Regulations Assessment.

1.0 The Additional Modifications

1.1 Alongside the Inspector's Report is published the definitive schedule of MMs that are required to make the Local Plan sound in planning terms. The majority of these MMs have undergone the Habitats Regulations Assessment (HRA) process, as part of the Main Modifications Consultation (December 2021 to February 2022). For refence, the HRA is listed on the Council's Main Modifications Consultation webpage and is labelled PHD-011.

1.2 The Inspector's Report highlights a small number of additional modifications to the detailed wording of the MMs where they are necessary for consistency or clarity, as a

result of comments received from the eight week consultation on the Main Modifications. The additional modifications at this stage are summarised as:

- MM17 – amended wording to paragraph 10.33 to reflect the recent name change of the nearby Cottage Plantation to Valerie Wells Wood.

- MM40 – amended wording to refer to Nationally Significant Infrastructure Projects rather than Nationally Strategic Infrastructure Projects.

- MM88 – amended wording to include Canvey Island Rugby Club as a community facility under the schedule included within Strategic Policy HS6 Community Facilities.

- MM56 – amended wording within criterion 4 of new Strategic Policy TP3 to delete some wording to be consistent with the Habitats Regulations.

2.0 Implications for the Habitats Regulations Assessment (document PHD-011)

2.1 The Inspector, in their Report, states of the additional modifications at this stage: *'None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and SA/HRA that has been undertaken.'*

2.2 Having reviewed the additional modifications, it is agreed that they would not alter or require any subsequent amendment to the Habitats Regulations Assessment document PHD-011 (November 2021), that has been subject to consultation. The additional modifications, by their nature, would not cause any additional adverse effects on the integrity of any Habitats site.

3.0 Summary

3.1 It is considered that the additional modifications outlined in the Inspector's Report (March 2022) can be 'screened out' for any additional Likely Significant Effects. No further iterations of the Habitats Regulations Assessment are required as a result of the additional modifications to the Local Plan. The HRA -including Appropriate Assessment- can continue to conclude that the Castle Point Local Plan is not predicted to have any adverse effect on the integrity of any Habitats sites, either alone or in combination with other plans and projects.

Please contact me with any queries.

Yours sincerely

Emma Simmonds MCIEEM BSc (Hons)
Ecological Consultant
Place Services at Essex County Council

Appendix 7

CASTLE POINT BOROUGH COUNCIL ADOPTION STATEMENT

Notice of the adoption of the new Castle Point Local Plan 2018-2033 in accordance with

The Planning and Compulsory Purchase Act 2004 (as amended) and The Town and Country Planning Act (Local Planning) (England) Regulations 2012 (as amended) ("2012 Regulations")

Notice is hereby given that (in accordance with above-mentioned legislation) Castle Point Borough Council formally adopted the new Castle Point Local Plan 2018 – 2033 on [23rd March 2022].

The new Castle Point New Local Plan 2018 – 2033 guides growth and development across Castle Point Borough Council's area to 2033. It identifies land for new development for the provision of housing, jobs and schools as well as areas for protection. The new Castle Point Local Plan also includes policies to help determine planning applications.

The new Castle Point Local Plan 2018 – 2033 was the subject of an independent examination conducted by Mr Philip Lewis BA (Hons) MA MRTPI, an Inspector appointed by the Secretary of State for the Department of Levelling Up, Housing and Communities (at the time of submission known as the Ministry for Housing, Communities and Local Government). This examination commenced on 2 October 2020 and ran until 3 March 2022 and included public hearing sessions. In his report published on 4 March 2022 the Inspector confirmed, subject to a number of main modifications, that the Castle Point Local Plan 2018 – 2033 is sound, legally compliant and capable of adoption. The recommended main modifications, along with additional and consequential minor modifications, have been included in the adopted new Castle Point Local Plan 2018-2033, which now carries full weight in the consideration of planning applications and replaces the following Development Plan Document of the Council:

- Castle Point 1998 Adopted Local Plan (saved in 2007)

All physical and digital copies of the above document will be removed from Castle Point Borough Council Offices, public libraries and the Council's website.

Any person aggrieved by the new Castle Point New Local Plan 2018-2033 may, with the leave of the High Court, make an application to the High Court under Section 113(3) of the Planning and Compulsory Purchase Act 2004 on the grounds that:

i. the Castle Point New Local Plan 2018-2033 is not within the appropriate power conferred by Part 2 of the Planning and Compulsory Purchase Act 2004; and/or
ii. a procedural requirement (as defined within Section 113 (10) of the Planning and Compulsory Purchase Act 2004) has not been complied with.

Any such application to the High Court must be made not later than the end of the period of six weeks beginning with the day after the date on which the Castle Point New Local Plan 2018-2033 was adopted (i.e. six weeks from [23 March 2022] – being the day after adoption).

In accordance with Regulations 26 and 35 of the 2012 Regulations the following documents have been made available:

i. the new Castle Point New Local Plan 2018-2033;
ii. this Adoption Statement;
iii. the final Sustainability Appraisal Report; and
iv. the final Habitats Regulations Assessment Report.

These documents can be viewed on the Council's website at www.castlepoint.gov.uk/new-local-plan. Paper copies of these documents will be made available as soon as practicable at the following locations during normal opening hours.

- Council Offices, Kiln Road, Benfleet, Essex, SS7 1TF (By appointment only)
- Canvey Library, 2 High Street, Canvey Island, Essex, SS8 7RB
- Hadleigh Library, 180 London Road, Hadleigh, Essex, SS7 2PD
- South Benfleet Library, 264 High Road, Benfleet, Essex, SS7 5HD
- Great Tarpots Library, 127 London Road, Benfleet, Essex, SS7 5UH

A copy of this Adoption Statement will be sent to all parties who have asked to be notified of the adoption of the Local Plan and to the Secretary of State for Levelling Up, Housing and Communities.

For further information please refer to the Council's website: www.castlepoint.gov.uk/new-local-plan or email planningpolicy@castlepoint.gov.uk

Ian Butt

Head of Place and Policy

[24th March 2022]

Appendix 7

CASTLE POINT BOROUGH COUNCIL ADOPTION STATEMENT

Notice of the adoption of the new Castle Point Local Plan 2018-2033 in accordance with

The Planning and Compulsory Purchase Act 2004 (as amended) and The Town and Country Planning Act (Local Planning) (England) Regulations 2012 (as amended) ("2012 Regulations")

Notice is hereby given that (in accordance with above-mentioned legislation) Castle Point Borough Council formally adopted the new Castle Point Local Plan 2018 – 2033 on [23rd March 2022].

The new Castle Point New Local Plan 2018 – 2033 guides growth and development across Castle Point Borough Council's area to 2033. It identifies land for new development for the provision of housing, jobs and schools as well as areas for protection. The new Castle Point Local Plan also includes policies to help determine planning applications.

The new Castle Point Local Plan 2018 – 2033 was the subject of an independent examination conducted by Mr Philip Lewis BA (Hons) MA MRTPI, an Inspector appointed by the Secretary of State for the Department of Levelling Up, Housing and Communities (at the time of submission known as the Ministry for Housing, Communities and Local Government). This examination commenced on 2 October 2020 and ran until 3 March 2022 and included public hearing sessions. In his report published on 4 March 2022 the Inspector confirmed, subject to a number of main modifications, that the Castle Point Local Plan 2018 – 2033 is sound, legally compliant and capable of adoption. The recommended main modifications, along with additional and consequential minor modifications, have been included in the adopted new Castle Point Local Plan 2018-2033, which now carries full weight in the consideration of planning applications and replaces the following Development Plan Document of the Council:

- Castle Point 1998 Adopted Local Plan (saved in 2007)

All physical and digital copies of the above document will be removed from Castle Point Borough Council Offices, public libraries and the Council's website.

Any person aggrieved by the new Castle Point New Local Plan 2018-2033 may, with the leave of the High Court, make an application to the High Court under Section 113(3) of the Planning and Compulsory Purchase Act 2004 on the grounds that:

i. the Castle Point New Local Plan 2018-2033 is not within the appropriate power conferred by Part 2 of the Planning and Compulsory Purchase Act 2004; and/or
ii. a procedural requirement (as defined within Section 113 (10) of the Planning and Compulsory Purchase Act 2004) has not been complied with.

Any such application to the High Court must be made not later than the end of the period of six weeks beginning with the day after the date on which the Castle Point New Local Plan 2018-2033 was adopted (i.e. six weeks from [24 March 2022] – being the day after adoption).

In accordance with Regulations 26 and 35 of the 2012 Regulations the following documents have been made available:

i. the new Castle Point New Local Plan 2018-2033;
ii. this Adoption Statement;
iii. the final Sustainability Appraisal Report; and
iv. the final Habitats Regulations Assessment Report.

These documents can be viewed on the Council's website at www.castlepoint.gov.uk/new-local-plan. Paper copies of these documents will be made available as soon as practicable at the following locations during normal opening hours.

- Council Offices, Kiln Road, Benfleet, Essex, SS7 1TF (By appointment only)
- Canvey Library, 2 High Street, Canvey Island, Essex, SS8 7RB
- Hadleigh Library, 180 London Road, Hadleigh, Essex, SS7 2PD
- South Benfleet Library, 264 High Road, Benfleet, Essex, SS7 5HD
- Great Tarpots Library, 127 London Road, Benfleet, Essex, SS7 5UH

A copy of this Adoption Statement will be sent to all parties who have asked to be notified of the adoption of the Local Plan and to the Secretary of State for Levelling Up, Housing and Communities.

For further information please refer to the Council's website: www.castlepoint.gov.uk/new-local-plan or email planningpolicy@castlepoint.gov.uk

Ian Butt

Head of Place and Policy

[24th March 2022]