



**Statement of Common Ground**

**Castle Point Plan 2026 to 2043**

**Regulation 19 Pre-Submission Draft**

**Between**

**Castle Point Borough Council**

**and**

**Brentwood Borough Council**

**Castle Point Local Plan 2026 to 2043**

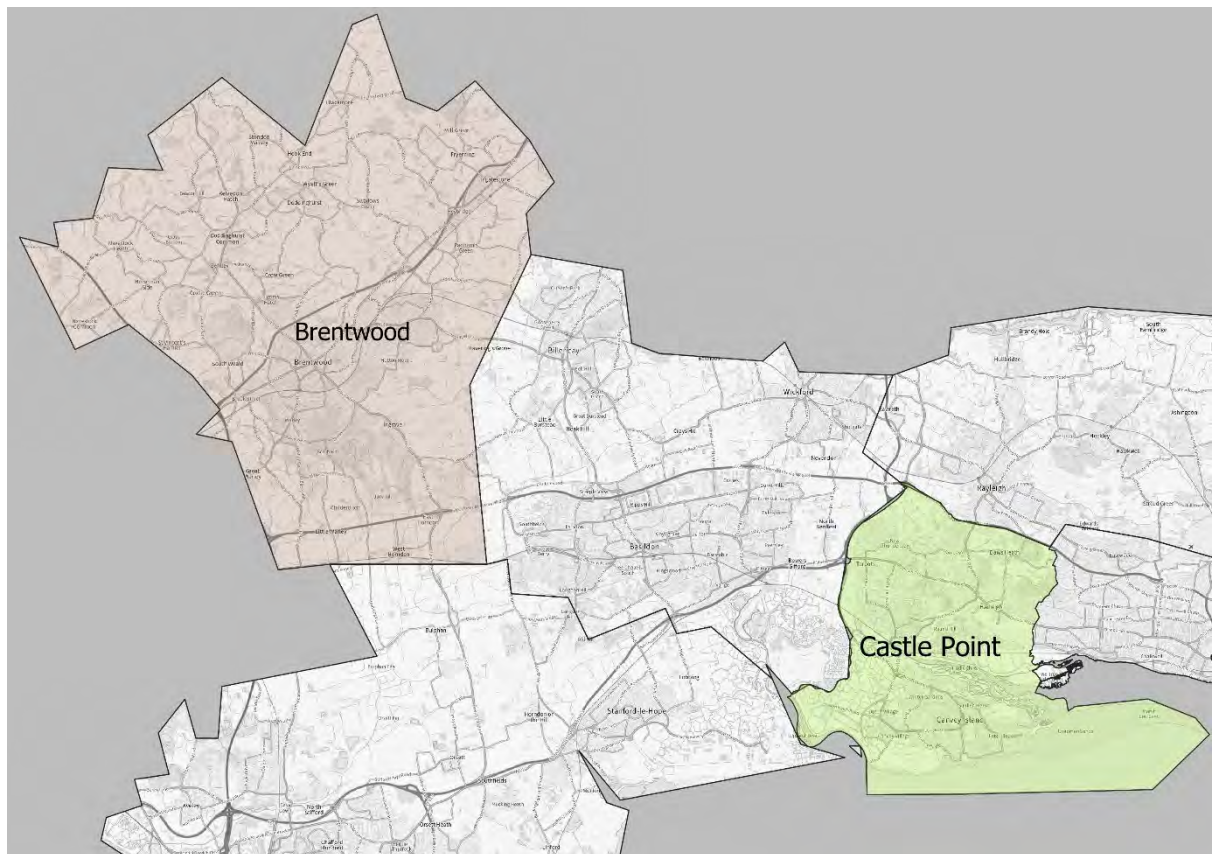
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**1. Introduction**

- 1.1. This Statement of Common Ground identifies areas of agreement between Castle Point Borough Council (CPBC) and Brentwood Borough Council (BBC) in relation to Castle Point Plan 2026-2043 and supporting evidence base.
- 1.2. This statement has been prepared to assist the examination of the Castle Point Plan. Brentwood Borough Council made representations to Regulation 18 Consultation in issues and options and Regulation 19 Publication of the plan drafts published for consultation on 22<sup>nd</sup> July 2024 to 16<sup>th</sup> September 2024 and on 1<sup>st</sup> August 2025 to 26<sup>th</sup> September 2025 consecutively. BBC confirmed their response during the Regulation 19 further consultation on 11<sup>th</sup> November 2025. BBC representations cover strategic cross boundary issues relating to:
  - The proposed housing strategy and the quantum of housing delivered over the planned period.

- The site allocation evidence to support housing strategy
- Shared transport networks and the impacts of cumulative growth.

1.3. The map below shows the locations and administrative areas covered by this statement. Castle Point and Brentwood are not neighbouring authorities but in the same functional housing market area in South Essex. Brentwood is situated 15 miles to the Northeast of Castle Point, only 20 miles from London with the M25 running along its boundary. The main settlement within Brentwood Borough is Brentwood itself followed by Shenfield, there are a number of smaller settlements as well. The planned garden village for 4000 dwellings of Dunton Hills is located near the A127 within Brentwood Borough. Castle Point Borough Council governs the settlements of Canvey Island, Benfleet, Daws Heath, Hadleigh and Thundersley.



1.4. Essex has two tiers of local government. Essex County Council (ECC) is the upper tier authority, and is responsible for services including education, transport, surface water flooding, libraries, waste management, minerals, and social services. ECC produces a range of strategies guiding the delivery of its services. Development contributions towards new or improved infrastructure which

supports ECC services and are outlined within the ECC Developer Guide to Infrastructure Contributions (2024)<sup>1</sup>.

- 1.5. The Castle Point 1998 Adopted Local Plan forms the development plan for the Borough. The Castle Point Plan will cover the period of 2026 to 2043 and aims to grow with a focus on regeneration, brownfield redevelopment and increased density in urban areas whilst protecting its green belt and ensuring that growth is climate resilient and supported by essential infrastructure.

## **2. Duty to Cooperate**

- 2.1. The councils of Basildon, Brentwood, Castle Point, Rochford, Southend on Sea, Thurrock and Essex County Council formed a strategic partnership in 2017 to develop a long-term growth ambition which would underpin strategic spatial, infrastructure and economic priorities in South Essex. The collaboration was underpinned by a Memorandum of Understanding (MoU) signed in January 2018<sup>2</sup> creating the Association of South Essex Local Authorities (ASELA). The membership includes members from each of the six local authorities, representatives from Essex County Council, Organisations and Business Leaders. In 2023 the leaders and Chief Executives agreed to refresh the identity for the partnership which is now known as the South Essex Councils (SEC). The SEC's core purpose is to provide leadership for South Essex and to deliver a vision for the region up to 2050<sup>3</sup> in order to promote healthy growth for South Essex Communities. This is achieved through collaboration, by sharing resources, joint evidence and by lobbying government. Members and Chief Executives have also been meeting regularly throughout 2025 to discuss devolution and local government reform.

- 2.2. The SEC is supported by the South Essex Joint Officers Group which both CPBC and BBC officers attend; the group meets monthly. Through joint working, shared evidence is prepared and strategic issues along with local plan preparations are discussed.

- 2.3. At a regional level the Essex Planning Officers Association (EPOA) represents officers from all 15 local authorities in Essex including CPBC and BBC. Planning heads from each local authority meet several times a year to provide leadership

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<sup>1</sup> [Essex County Council Developers Guide to Infrastructure Contributions 2024](#)

<sup>2</sup> [South-Essex-Joint-Strategic-Plan-Statement-of-Common-Ground-June-2018](#)

<sup>3</sup> <https://www.southessex.org.uk/opportunity-south-essex>

and discuss strategic matters across all of Essex. Terms of reference including governance for this decision-making body was agreed in December 2020<sup>4</sup>.

- 2.4. CPBC also has one to one quarterly meetings with BBC to consider any specific shared strategic matters, shared evidence and to appraise each other on their local plan preparation and any potential impacts.
- 2.5. CPBC has also collaborated with BBC on various environmental strategy documents, and these include the EPOA Planning Policy Statement- Operation Energy and Carbon (Net Zero) October 2025, and the Work of the Essex Climate Action Commission, the Essex Local Nature Recovery Strategy and the Essex Recreational Avoidance and Mitigation Strategy. All of which have been implemented across both authorities.
- 2.6. CPBC has fully engaged with BBC on the development of its local plan from the outset. In accordance with the Town and Country Planning (Local Planning) (England) regulations 2004, BBC has been formally consulted at each stage of consultation on the Castle Point Plan. The Duty to Cooperate Compliance Statement outlines in detail the engagement activities and outcomes together with the joint evidence base studies undertaken during the Plan's preparation and any protocols agreed which benefit strategic and cross boundary plan making.

### **3. Strategic Matters**

- 3.1. South Essex's proximity to London and its position on the Thames Estuary have been the major factors behind the historical growth of South Essex and these will continue to be major influences on its future growth and wider relationship with the rest of Essex. Southend Airport, the Port of Tilbury and DP World London Gateway in Thurrock and the forthcoming Lower Thames Crossing which will link Essex via Thurrock to Kent will also provide economic opportunities for the area.
- 3.2. As authorities within the same functional housing market area CPBC and BBC have shared interests particularly around highways, the economy and housing needs.
- 3.3. South Essex 2050 Ambition was initiated by the Association of South Essex Local Authorities (ASELA) in 2018 and furthered by South Essex Councils (SEC) and aims to build on South Essex's economic opportunities. Its objectives are to prioritise growth that provides good digital infrastructure, improved transport connectivity,

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<sup>4</sup> [Chief Officers' Group and EPOA Partnership - Terms of Reference](#)

enhanced green and blue infrastructure opportunities, greater commercial development and employment skills and good quality housing in the right places.

3.4. The Castle Point Plan's vision and objectives are in accord with the South Essex 2050 Ambition and envisages a borough where residents have good quality and affordable homes in thriving communities with access to green spaces, economic opportunities, and amenities enabling them to fulfil their potential and live happy, healthy lives.

3.5. Both CPBC and BBC support the vision of South Essex as described in the South Essex 2050 ambition and agree to progress this vision through their plan making.

#### **4. Infrastructure: Strategic transport connections.**

4.1. There is significant congestion along the entire transport network within South Essex particularly the A127 which is the main shared route between Castle Point and Brentwood, however, the capacity issues of the surrounding roads in South Essex e.g. A130, A12 also impact both authority areas in causing unreliable journey times and slower than average speeds.

4.2. The A127 or Southend Arterial Road provides a strategic east to west route across South Essex stretching from Southend to London Borough of Havering through Brentwood joining the M25. It is not trunked and spans three highway authorities and five local planning authorities and the route already experiences significant capacity issues particularly at M25 junctions 28 and 29 in Brentwood and Fairglen junction in Castle Point.

4.3. Junction modelling has been included in the Transport Assessment report and assessed the likely impacts of Castle Point's planned growth on the surrounding highway network. This included a high-level analysis of cross boundary traffic flows on key highway links along the A127. Further transport assessments will be carried out as housing allocations come forward during the local plan period.

4.4. BBC and the other South Essex Local Authorities are currently preparing their local plans and developing their housing strategies to accommodate the expected significant growth across South Essex. As these local plans come forward, their transport assessments will add to the evidence and provide greater granular detail of the impact of this cumulative growth on the transport network.

4.5. Essex County Council is the local Highways and Transportation Authority and is responsible for local transport planning and the provision and maintenance of the highway network, as well as preparing the Local Transport Plan. This is currently

being updated to LTP4 with the collaboration of all Essex authorities. Essex is currently entering a transitional phase, with the election of a Mayor for Greater Essex and changes to local government structures as a result of devolution and local government reorganisation, but Essex County Council with the collaboration of Essex authorities including CPBC and BBC are finalising the preparation of LTP4 to support the new structures once they are in place as well as guide the development in emerging local plans.

- 4.6. CPBC and BBC agree to work collaboratively with all South Essex authorities on their transport assessments including Essex County's work on the LTP4.
- 4.7. The SEC authorities and London Borough of Havering have prepared a statement of common ground<sup>5</sup> with regards to the issues for sustainable growth and plan making that the A127 Transport Corridor presents. The Highway Authorities are also developing a joint Implementation Plan as part of the A127 Corridor for Growth (The Route Management Strategy) and along with the A127 Corridor Engagement Group are making the case for the A127 to be re-adopted as a trunk road.<sup>6</sup>
- 4.8. Improvements are planned for both the M25/A127 junction and the wider A127 corridor. The M25 Junction 28 project has just been open and provides a loop road which connects the anticlockwise M25 with the A12 eastbound at Junction 28. Additional funding has been provided for the A122 Lower Thames Crossing which would connect the A2 and M2 in Kent to the A13 in Thurrock and junction 29 of the M25 in the London Borough of Havering. The A127 Corridor for Growth project provides for a broader package of improvements which includes realigning the Fortune of War Junction near Basildon. Improvements to the Fairglen Interchange have received investment funding from Central Government, Essex County Council and Southeast Local Enterprise Partnerships to provide improvements which are expected to be in place by 2027
- 4.9. Both CPBC and BBC support and are actively involved in these initiatives for improvements to the A127 and surrounding interconnected highway routes which are served by or feed into it. Both Councils agree to have regard for the Local Transport Plan within their local plans.
- 4.10. The Castle Point Plan also promotes active travel within its policy T3 which requires all new development to prioritise active travel routes to reduce the amount of private car usage across its authority area.

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<sup>5</sup> [DUT006 Statement of Common Ground on A127 Strategic Transport Issues.pdf](#)

<sup>6</sup> [A127 Economic Growth Corridor | Essex County Council](#)

- 4.11. CPBC and BBC agree to continue to work collaboratively to mitigate cumulative impact of their growth plans on the shared transport routes. Both Councils also agree to work collaboratively with relevant organisations and neighbouring authorities to ensure that the necessary infrastructure is in place to support the growth needs set out in their Local Plans.

## **5. Housing Need**

- 5.1. In December 2024, the government introduced changes to the NPPF along with changes to the standard methodology for calculating housing need, from this the government set annual housing delivery targets which will require local authorities to plan for significantly more housing within the South Essex area.
- 5.2. The Standard Method Housing Need for CPBC over the planned period of 2026-2043 is 11,662, which equates to an average of 686 dwellings per annum. The annual housing delivery for Castle Point averages at 100 dwellings per annum. Castle Point is 17.4 square miles in size with a population density of 4.976 per square mile. Over half of the borough is designated Green Belt and the majority of the borough is low lying land below sea level resulting in 45% of it in flood zone 3.
- 5.3. BBC agrees that Castle Point faces notable physical constraints including size, density, transport issues and environmental constraints with a substantial proportion of land designated as Green Belt and a significant proportion falling within Flood Risk Zone 3
- 5.4. CPBC has commissioned various pieces of work to review land availability throughout the Local Plan Making process including earlier work on Strategic Land Availability and Urban Capacity January 2023 and the Borough wide development options and technical paper July 2024 which identified land availability outside of Green Belt and through density modelling and site identification looked at the most effective use of this land for development. CPBC have also prepared a Green Belt Assessment July 2025<sup>7</sup> as guided by the NPPF to identify potential Grey Belt sites for development. Identified sites were reviewed against further criteria: designated habitat and heritage sites; flood risk zones; transport restraints e.g. access issues or requirements for significant upgrades on highways impacting viability; and sustainability criteria. This work has been described in the Housing Capacity Topic paper July 2025<sup>8</sup>. CPBC also prepared, the Strategic Land Availability Assessment July 2025<sup>9</sup> and Site Assessments for Canvey Island<sup>10</sup>,

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<sup>7</sup> [Castle Point Green Belt Assessment July 2025](#)

<sup>8</sup> [Housing Capacity Topic Paper July 2025](#)

<sup>9</sup> [Strategic Land Availability Assessment July 2025](#)

<sup>10</sup> [Strategic Land Availability Site Assessment Canvey Island July 2025](#)



Benfleet, Hadleigh, Thundersley and Daws Heath<sup>11</sup> July 2025. The approach to site assessments is further supported by the Sustainability Appraisal July 2025.<sup>12</sup>

- 5.5. The Sustainability Appraisal objectively assessed alternative growth scenarios including one which would meet the Standard Methodology Housing Need. Objective 14 considered which scenario would provide appropriate housing and accommodation to meet future and existing needs of the whole community. Its conclusion was that as the local Housing Needs Assessment 2023 identified an Objectively Assessed Need (OAN) of 255 per annum for Castle Point, 197 of which are derived from the 10-year migration trend, the Castle Point Plan would meet the OAN figure in full and the 10-year migration trend allowance and would therefore be a positive. The higher Standard Methodology Housing Need would provide no additional benefits in terms of meeting the needs of the community i.e. Castle Point.
- 5.6. CPBC has considered what housing delivery can be realistically achieved within its boundaries taking into account its significant environmental and infrastructure restraints as well as its market capacity. The evidence from the Green Belt Assessment, Strategic Land Availability Assessments, Housing Topic Paper and the recently finalised Porter Planning Economics Castle Point Housing Delivery Technical Note has identified that CPBC has the capacity to deliver 6,196 homes through the planned period.
- 5.7. The CPBC realises that the Castle Point Plan delivers considerably less housing than the Standard Method Housing Need but considers based on the evidence that this is a realistic housing delivery.
- 5.8. CPBC and BBC agree that the Castle Point Plan is proposing a lower housing delivery than the Stand Method Housing Need.

## **6. Meeting Unmet Housing Need**

- 6.1. Following the revised NPPF 2024 and the introduction of the new standard methodology for calculating housing need, CPBC contacted its neighbouring authorities including BBC in January and February 2025 to assist with meeting the newly calculated housing need. This was in accordance with the Essex Planning Officer's Association (EPOA) Unmet Housing Need Protocol 2017. All responded

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<sup>11</sup> [Strategic Land Availability Site Assessment Benfleet, Thundersley, Hadleigh, Daws Heath July 2025](#)

<sup>12</sup> [Sustainability Appraisal Main Report July 2025](#)



with the view including BBC that at the time they could not offer any assistance in meeting CPBC's unmet housing needs.

- 6.2. BBC agrees that CPBC has followed the EPOA Unmet Housing Need protocol to address its unmet housing need.
- 6.3. CPBC is working through the South Essex Joint Officers Group to try to address their unmet housing need. Part of this work includes reviewing the EPOA mechanism for considering unmet housing need established in 2017 and providing a shared joint position statement on the housing need within South Essex.
- 6.4. Both CPBC and BBC agree to continue to work collaboratively through SEC to address CPBC and other authority areas' unmet housing need within South Essex.

## **7. HOU6 Gypsy and Traveller Accommodation**

- 7.1. CPBC has accommodated for all its Gypsy and Traveller Pitch need through the intensification of pitches at Orchard Place and Janda Fields. The EPOA programme is currently conducting a study into the transit site requirements within Essex.
- 7.2. CPBC and BBC support the work of the EPOA programme and will work with all Essex Councils on the transit site requirements within Essex County.

## **8. Modifications to Castle Point Plan Regulation 19 Draft**

- 8.1. BBC through their representations to the Castle Point Plan Regulation 19 Draft, did not identify any modifications to the Plan.

## **9. Areas of Agreement**

- 9.1. CPBC has worked collaboratively with BBC to ensure that all cross boundary strategic issues have been properly considered and where appropriate reflected in the Castle Point Plan 2026 to 2043 and effective and ongoing joint working has and will continue to be undertaken
- 9.2. It is agreed that CPBC and BBC will continue to work through the South Essex Council, Essex Planning Officers Association at member and officer level to address strategic issues across the Essex region and subregion of South Essex
- 9.3. It is agreed that the Castle Point Plan 2026-2043 does not allocate sufficient sites to meet the Standard Methodology Housing Need for housing at this time. It is agreed that there are significant environmental, physical and infrastructure constraints which impact delivery of the housing need in Castle Point.

- 9.4. It is agreed that both CPBC and BBC will collaborate through their local plan making to consider the impact of the cumulative growth across South Essex on the transport network.

## **10. Areas of Uncommon Ground**

- 10.1. Through the Duty to Cooperate, CPBC and BBC have jointly considered issues relating to housing, gypsy and traveller needs, jobs and employment, retail and tourism, natural environment, strategic site allocations and the sustainability appraisal. There are currently no areas of uncommon ground in relation to these topics.

## **11. Additional Strategic Matters**

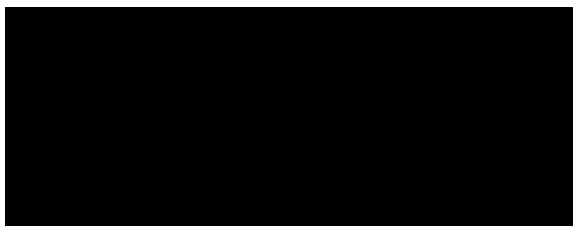
- 11.1. There are no additional strategic matters which CPBC and BBC are aware of which has not already been addressed by this Statement of Common Ground.

## **12. Monitoring**

- 12.1. This statement will be maintained by CPBC and updated as necessary.

## **13. Signatories**

- 13.1. The signatories agree that the Castle Point Plan has been prepared in accordance with the “Duty to Cooperate” imposed by Section 33A of the Planning and Compulsory Purchase Act 2004 in that the Council has cooperated with BBC as a neighbouring authority, through constructive and ongoing engagement on the impacts of sustainable development set out in the Duty Cooperate State of Compliance and that there are no outstanding strategic planning issues to be addressed.

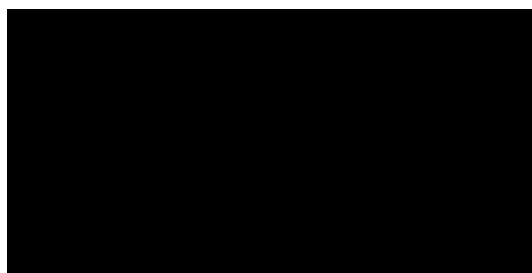


Name: Amanda Parrott

Position: Assistant Director, Climate & Growth

Date: 5 December 2025

Castle Point Borough Council



Name: Emma Goodings

Position: Director of Place

Date: 05/12/25

Brentwood Borough Council