



Statement of Common Ground

Castle Point Plan 2026 to 2043

Regulation 19 Pre-Submission Draft

Between

Castle Point Borough Council

and

The Environment Agency

Castle Point Local Plan 2026 to 2043

Date:

1. Introduction

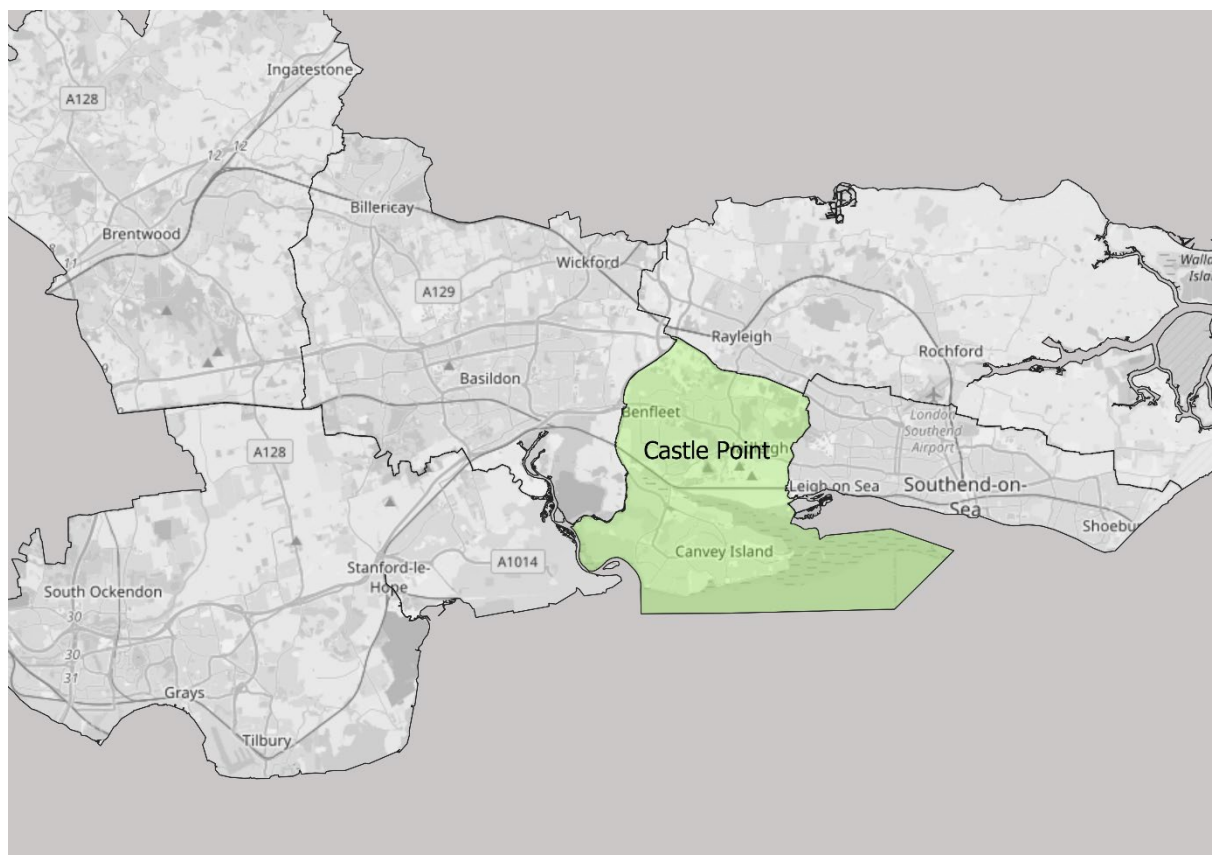
1.1. This Statement of Common Ground identifies areas of agreement between Castle Point Borough Council (CPBC) and The Environment Agency (EA) in relation to Castle Point Plan 2026-2043 and supporting evidence base.

1.2. This statement has been prepared to assist the examination of the Castle Point Plan. The Environment Agency made representations to Regulation 18 Consultation in issues and options and Regulation 19 Publication of the plan drafts published for consultation on 22nd July 2024 to 16th September 2024 and on 1st August 2025 to 26th September 2025 consecutively. EA confirmed their response to the Regulation 19 Draft during further consultation on 28th October 2025. EA representations cover issues relating to:

- The Level 1 & 2 Strategic Flood Risk Assessments to support the Castle Point Plan

- The SFRA in relation to the housing allocations at Benfleet for B7A Richmond Avenue Carpark and B8 Manor Trading Estate.
- Policy C8 Residential Park Homes
- Policy D6 Residential Annexes

1.3. The map below shows the locations and administrative areas covered by this statement. Castle Point is a small borough in South Essex situated on the Northern Bank of the Thames Estuary. Castle Point Borough Council governs the settlements of Canvey Island, Benfleet, Hadleigh and Thundersley. Around 50% of the Borough falls within Flood risk zone 3 due to tidal flood risk from the Thames Estuary.



1.4. The Environment Agency works to protect and improve the environment to create better places for people and wildlife. It is responsible for regulating major industry and waste; treatment of contaminated land; water quality and resources: fisheries; inland river, estuary and harbour navigations; conservation and ecology and for managing the risk of flooding from main rivers; reservoirs; estuaries and the sea. The Environment Agency leads on tidal flooding and on fluvial flooding from Main River water courses and has a strategic overview for all other sources of flooding. It supports sustainable development and works

with organisations to manage the use of resources, increase resilience to the risks of flooding and coastal erosion and aims to protect and improve water, land and biodiversity.

1.5. Essex County Council is the lead local flood authority (LLFA) and is responsible for managing the risk of flooding from surface water, groundwater and ordinary watercourses and leads on community recovery for Essex including Castle Point.

1.6. 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. It will 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. CPBC meets the EA and neighbouring coastal authorities quarterly to develop a Riverside Strategy covering the areas of the Bowers Marshes, Canvey Island and Hadleigh Marshes Policy to help deliver one of the aspirations of the Thames Estuary 2100 plan. The Riverside Strategy will plan for improvements to and management of flood defences, enhancing ecological networks along the coast, as well as improving access to the coast for people as well as improving access to the river and promoting the cultural significance of the Thames.

2.2. CPBC has also collaborated with EA 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 South Essex authorities.

2.3. 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 creating the Association of South Essex Local Authorities (ASELA). The membership includes members from each of the six local authorities, and representatives from Essex County Council, the Environment Agency and other Stakeholder Organisations and Business Leaders. In 2023 the leaders and Chief Executives agreed to refresh the identity for the partnership which is now known as 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 in order to promote healthy growth for South Essex Communities. This is achieved through collaboration, by sharing resources, joint evidence and by lobbying government.

2.4. The SEC developed the South Essex 2050 Vision including SEEPARK which aims to link five varied large-scale landscapes including woodland, parkland and marshland across South Essex to provide benefits for ecological diversity, carbon capture and opportunities for leisure, tourism and business. SEEPARK is an ambitious green infrastructure project supported by Natural England, the Environment Agency and South Essex Local Authorities.

2.5. CPBC has fully engaged with EA on the development of its local plan from the outset including advising CPBC on the modelling methodology for the Strategic Flood Risk Assessment. In accordance with the Town and Country Planning (Local Planning) (England) regulations 2004, EA 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.

3. Strategic Matters: The Thames Estuary

3.1. The Thames Estuary is formed where the River Thames meets the tidal waters of the North Sea and the Estuary and the low lands abutting it, faces a number of environment challenges including raising sea levels as a result of changes linked to climate change. The Thames Estuary 2100 Plan prepared by the Environment Agency outlines strategies to manage flood risks and protect the estuary's natural habitats and history. The Thames Estuary Asset Management Programme 2100 (TEAM2100) is a 10-year initiative to refurbish and replace tidal flood defences ensuring the integrity for the medium term of the plan. The Thames Estuary Partnership (TEP) works with various stakeholders to enhance and protect the estuary's environmental heritage. These efforts aim to safeguard the Thames Estuary from the impacts of Climate Change and promote sustainable development.

3.2. Through working with the EA and neighbouring authorities CPBC will put in place a Riverside Strategy to implement the Thames Estuary 2100 Plan, and this has formed the basis for Policy ENV2.

4. Strategic Issues: Strategic Flood Risk Assessment

4.1. Castle Point has published a Level 1 & 2 Strategic Flood Risk Assessment in March 2025. This pre-dated the release of the new National Flood Risk

Assessment (NaFRA2) and as a result the changes to flood mapping contained in NaFRA2, were not reflected in the SFRA which supported the regulation 19 consultation. Castle Point has worked with EA during the preparation of its Level 1 & 2 Strategic Flood Risk Assessment.

4.2. The EA referred to the New National Flood Risk Assessment in their response to the Regulation 19 Public Consultation to the Castle Point Plan. It was noted that flood extents at two site allocation sites (Site B7A-Richmond Avenue car park and Site B8 Manor Trading Estate) had changed as a result of the NaFRA2 modelling.

4.3. The SFRA has been updated to take account of the New National Flood Risk Assessment and Sites B7A and B8 have been re-evaluated to ensure that the Sustainability Appraisal and Sequential Test are properly considered, and Level 2 SFRA site assessment has been updated for both sites.

5. Policy C8 – Residential Park Home Sites, Canvey Island

5.1. Canvey island is low lying with ground levels nearly two metres below the daily high tide level in the Thames estuary, and consequently at risk of tidal flooding and is classified as Flood Zone 3. The island is protected by 14 miles of Tidal Flood Defences which provide a very high standard of protection. A 2 mile stretch of the island's revetment has recently been renewed by the EA on its southern shoreline between Thorney Bay and the Island Yacht Club.

5.2. Policy C8 refers to the delivery of 1,600 dwellings at the Residential Park sites on Canvey Island at Sandy Bay Park and Kings Park over the local plan period. The EA raised concerns over the increased residential development on these sites, which are in Flood Zone 3, and which would not be permitted as compatible development under current Guidance as set out in table 2 of the Flood Risk and Coastal Change Planning Practice Guidance when considering the Flood Risk Vulnerability Classification of residential park homes (from Annex 2 of the NPPF).

5.3. With reference to paragraph 8.66 of the Plan, these sites have come forward under existing 50+ year old planning consents which permit the siting of caravans under the provisions of the Caravans Act 1960 and within the definition at the time this included Park Homes. The planning consents have no time constraints on development and no restrictions on whether the uses are for permanent or temporary seasonal accommodation. There is some scope under licencing of these sites to control the development of these sites. However, the local plan's ability to influence the development of these sites is limited.

5.4. The Council is keen to encourage that any dwellings on these sites are flood-resilient and has proposed the following changes to the policy to 4.a. and 4.b.

“4. Any redevelopment of these sites will be acceptable where:

4.a. The risk to occupants and property from flood risk and other hazards are minimised. With residential development having regard for flood resilient design. Guidance on designing flood resilient homes can be found in [Improving the Flood Performance of New Buildings](#) and in [Building a flood resilient future](#). All proposed development seeking planning permission should be accompanied by a flood emergency plan, demonstrating the steps that will be taken to manage flood risk.

4.b. The overall quantum of residential development is retained, ~~or increased~~;

6. Policy D6-Residential Annexes

6.1. Policy D6 refers to provision of residential annexes within the curtilage of an existing property. EA requested within their response to the Regulation 19 consultation that additional wording should be added with regards extensions to single storey dwellings in high-risk flood areas, as residents in these types of dwellings are highly vulnerable to flood risk. For such dwellings a place of safety/refuge above the assessed level of flooding from any source must be provided as part of the extension.

6.2. EA also requested that additional wording to be added for annexes or extensions in areas at risk of flooding, that flood resistance and resilience measures should be required as part of the design in order that the development could be quickly brought back into use without significant refurbishment.

6.3. Many extensions and annexes have permitted development rights and as such do not require planning permission and consequently the Local Plan has limited influence on these types of development

d. The design of annex or extensions should include flood resistance and/or resilience measures to allow the development to be quickly brought back to use without significant refurbishment following a flood event. For single storey dwellings, a place of safety/refuge above the assessed level of flooding from any source should be provided wherever possible.

7. Modifications to the Castle Point Plan Regulation 19 Draft

7.1. The EA through their representation to the Castle Point Plan Regulation 19 Draft identified the following modifications to the Plan.

- **Additional wording at C8 Residential Park Home Sites, Canvey Island**

4. Any redevelopment of these sites will be acceptable where:

4.a. The risk to occupants and property from flood risk and other hazards are minimised. With residential development having regard for flood resilient design. Guidance on designing flood resilient homes can be found in [Improving the Flood Performance of New Buildings](#) and in [Building a flood resilient future](#). All proposed development seeking planning permission should be accompanied by a flood emergency plan, demonstrating the steps that will be taken to manage flood risk

4.b. The overall quantum of residential development is retained.

- **Additional wording at D6 Residential Annexes**

d. The design of annex or extensions should include flood resistance and/or resilience measures to allow the development to be quickly brought back to use without significant refurbishment following a flood event. For single storey dwelling, a place of safety/refuge above the assessed level of flooding from any source should be provided wherever possible.

8. Areas of Agreement

- 8.1. CPBC has worked collaboratively with EA to ensure that all environmental strategic issues have been properly considered and where appropriate reflected in the Castle Point Plan 2026-2043 and effective and ongoing joint working has and will continue to be undertaken.
- 8.2. It is agreed that CPBC and EA will continue to work in partnership with the LLFA and neighbouring coastal authorities on the Riverside Strategy to implement Thames 2100
- 8.3. It is agreed that the SFRA Level 1 and 2 has been updated to reflect the New National Flood Risk Assessment.
- 8.4. It is agreed that policy B7A and B8 has been updated to reflect the New National Flood Risk Assessment and be re-evaluated.
- 8.5. It is understood that the local plan has limited powers over the development at Residential Park Home Sites in Policy C8, due to the existing historic permissions on these sites. It is agreed that additional criteria will be added to C8 to encourage that the design of new development is resilient to flood risk.

8.6. It is understood that many annexes and extensions benefit from permitted development rights. It is agreed that additional criteria will be added to D6 to encourage all new annexes and extensions to have flood resilience designed into them.

9. Areas of Uncommon Ground

9.1. Through the Duty to Cooperate, CPBC and SCC have jointly considered all environmental issues that may be impacted by the growth plans of the Castle Point Plan. There are currently no areas of uncommon ground.

10. Additional Strategic Matters

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

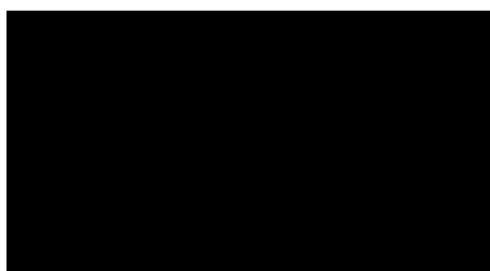
11 Monitoring

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

12 Signatories

12.1 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 EA as a statutory consultee, 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:

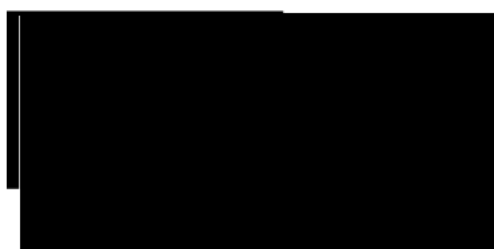


Role: Assistant Director, Climate & Growth

Date: 17 December 2025

Castle Point Borough Council

Name: Pat Abbott



Role: Planning Advisor

Date 17/12/2025

The Environment Agency