



Statement of Common Ground
Castle Point Plan 2026 to 2043
Regulation 19 Draft

Between

Castle Point Borough Council

and

Sport England

November 2025

1. Introduction

- 1.1 This Statement of Common Ground (SoCG) has been prepared jointly by Castle Point Borough Council (CPBC) and Sport England in relation to the Castle Point Local Plan (known as the Castle Point Plan).
- 1.2 The purpose of this SoCG is to set out the areas of agreement and any outstanding matters between the parties, in accordance with the requirements of the National Planning Policy Framework (NPPF, paragraph 28) and the Planning Practice Guidance.
- 1.3 As part of the evidence base to support the Castle Point Plan, an update to the Playing Pitch Strategy 2018 and Open Space Assessment 2023 and Built Facilities Needs Assessment and Strategy 2018, is underway. These updates have informed the policies and allocations relevant to sport and recreation within the Castle Point Plan. Sport England have been a key stakeholder through the development of these updated studies. This work is due for completion in early 2026.
- 1.4 Throughout the development of the Castle Point Plan, CPBC and Sport England have engaged regularly with regards its role as statutory consultee.
- 1.5 In accordance with the Town and Country Planning (Local Planning)(England) Regulations 2012, Sport England has been formally consulted at Regulation 18 and 19 stage of consultation and early drafts of policies prior to public consultation have been shared with Sport England.
- 1.6 This SoCG identifies the matters on which CPBC and Sport England are agreed, as well as any areas where differences remain.

2. Strategic Matters

2.1 This section identifies the strategic matters relevant to both CPBC and Sport England in the context of the Castle Point Plan.

2.2 The following strategic matters are recognised by both parties:

- Protection of existing sports facilities and open space
- Provision of new and enhanced facilities to support growth
- Promoting active lifestyles and access to high-quality sport and recreation facilities is a strategic objective of both Sport England and CPBC.

2.3 CPBC and Sport England acknowledge and agree that they share a mutual commitment to the objectives of Sport England's Place Partnership programme, which was expanded in November 2023 to invest in local communities most in need, ensuring they can access sport and physical activity. As one of the 80 new designated places across England, and one of three in Essex, CPBC will work collaboratively with Sport England to create the conditions for change at a local level. This partnership will deliver impact by decreasing inactivity, increasing activity, providing positive experiences for children and young people, and tackling inequalities that prevent participation.

3. Areas of Agreement (Common Ground)

3.1 Sport England submitted representations to the Castle Point Plan during the Regulation 19 Draft Consultation (1 August to 26 September 2025) on 5 August 2025 and confirmed their position during the further consultation on the 30 October 2025.

3.2 Sport England support the direction and aim of several policies and principles, as follows:

Vision	Support is offered for the proposed vision in terms of green spaces, community buildings and other community spaces delivering health and wellbeing outcomes
Objectives	Objectives 2, 3, 17 and 19 are supported as these objectives would support the provision of opportunities for sport/physical activity and encourage active environments.
Policy SP1 – Supporting Enhancements of the Borough’s Green Spaces	The policy is supported due to its focus on protecting and enhancing the Borough’s green and blue infrastructure to support health and wellbeing including physical activity.
Policy SP3 – Meeting Development Needs	The policy is supported, especially part 3 because the requirements would support the creation of active environments that would encourage physical activity through the planning and design of development
Policy SP4 – Development Contributions	The policy is supported as it would help ensure that infrastructure requirements arising from development including facilities that support community sport and physical activity are provided to meet the additional demands created by new developments. The specific reference in paragraph 6.62 of the reasoned justification to sports facilities as a type of infrastructure that is needed is welcomed in this context

Policy B9 – South Benfleet Playing Fields	The principle of masterplanning South Benfleet Playing Fields as a multi-functional green space is welcomed as this would encourage sport and physical activity to take place. Criterion 5 is particularly welcomed as it will help ensure that the existing playing pitches which make an important contribution to its multi-functional role are not lost or prejudiced by future proposals
Policy Had4 – Land South of Scrub Lane	Land south of Scrub Lane (Ref: 318) was land last used as a playing field albeit many years ago. The site was allocated in the previous Local Plan that was not adopted. Sport England's position on this allocation when consulted in the past was that based on the individual circumstances of the site (including the limited size of the site and the lack of ancillary facility infrastructure) the principle of development would be acceptable if mitigation could be secured in the form of an appropriate financial contribution in lieu of direct replacement playing field provision that could be used towards new or enhanced playing field provision in the Borough. This is justified due to the deficiencies identified in the Council's Playing Pitch Strategy as the site could be brought back into use to help address these deficiencies. The requirement in part 5 of the policy (and paragraph 10.30 of the reasoned justification) for the loss of playing field land to be mitigated by an appropriate financial contribution towards new or enhanced playing fields nearby is therefore supported
Policy Thun2 – Kiln Road Campus	The site contains strategically important community sports facilities that serve the Thundersley, Benfleet and Hadleigh areas of the Borough namely the Runnymede Leisure Centre and USP College. The requirement in part 1 of the policy (and paragraph 11.12 of the reasoned justification) re-provide the community uses with equivalent or better provision either on-site or off-site is welcomed as this should ensure that any future proposals that require the redevelopment of these facilities will make provision for their replacement
Policy Infra4 – Open Spaces	The policy is supported (especially part 2 and 4) as it supports the protection of open space including playing pitches unless suitable criteria are met

Policy Infra5 – Sports Provision	The policy and its reasoned justification are supported as it supports the protection of indoor sports facilities and securing provision for additional or enhanced indoor sports facilities and outdoor sports facilities/playing pitches in new development
Policy T1 – Transport Strategy	The policy is supported due to its focus on supporting sustainable and active travel modes which will encourage physical activity. In particular, part 2 of the policy (and paragraph 20.10 of the reasoned justification) is supported as this requires new development to be designed using active design principles so that people can walk, cycle and wheel in their local area with ease
Policy T3 – Active Travel Improvements	The policy is supported due to its focus on measures that will support active travel improvements which will encourage physical activity. In particular, part 5 of the policy is supported as this would support active travel routes through public open spaces which would provide opportunities for people to be active when they are travelling to open spaces where they will participate in physical activity

3.3 The entries in the table below sets out the agreed modifications to the Castle Point Plan, which resolve all Sport England’s representations. All modifications in this SoCG are also included in the Council’s Modifications Schedule.

Rep Number	Policy / Para ref	Sport England Reg 19 Position	Agreed position between CPBC and Sport England
0738	D1 – Design Objectives	<p>In view the Local Plan’s vision and strategic objectives relating to delivering health and wellbeing outcomes to enable more active and healthier lifestyles for residents, it is surprising that a design objective does not encourage development to be designed to encourage physical activity. While reference to Sport England’s Active Design is made later in the plan in paragraph 16.34 of the reasoned justification to Policy D2, there is no specific objective in the design principles policy. As well as positively responding to the Local Plan’s vision and objectives, the inclusion of an additional objective to address this matter would allow the policy to be consistent with paragraphs 96(c and 129(e of the NPPF as well as the Active Design guidance.</p> <p>An objection is therefore made to the Local Plan in its current form as it would not be considered to meet the ‘positively prepared’ or ‘consistent with national policy’ tests of soundness.</p> <p>To address this, it is requested that an additional design objective is included in Policy D1 along the following lines:</p> <p>“Maximise opportunities for encouraging physical activity”</p> <p>It is also requested that the reasoned justification then provides a short explanation of the importance of</p>	<p><u>Modification to Policy D1</u></p> <p>p. Maximise opportunities for encouraging physical activity.</p> <p><u>Modification to paragraph 16.28</u></p> <p>Developments have the potential to improve accessibility and local permeability by making places that connect with each other and are easy to move through. This also encourages the use of active travel and encourages physical activity. Promoting legibility through development helps to provide recognisable routes, intersections and landmarks to help people find their way around; and make faster journeys. Sport England have also developed ‘<u>ten principles to inform active design</u>’ which provide guidance on how the design of environments can help people lead more physically active and healthy lives.</p>

Rep Number	Policy / Para ref	Sport England Reg 19 Position	Agreed position between CPBC and Sport England
		designing developments to encourage physical activity and that Sport England's Active Design guidance is signposted to for detailed advice on how this can be achieved in practice.	
0738	Infra3 – Improving Health and Wellbeing	<p>In view the Local Plan's vision and strategic objectives relating to delivering health and wellbeing outcomes to enable more active and healthier lifestyles for residents, it is surprising that the policy does not go beyond the focus on providing conventional health infrastructure and also cover preventative health measures. In particular, a health and wellbeing policy in a Local Plan would be expected to require developments to be planned and designed to support physical activity and thereby encourage healthy lifestyles. As well as positively responding to the Local Plan's vision and objectives, the inclusion of an additional requirement to address this matter would allow the policy to be consistent with paragraphs 96(c and 129(e of the NPPF.</p> <p>An objection is therefore made to the policy in its current form as it would not be considered to meet the 'positively prepared' or 'consistent with national policy' tests of soundness.</p> <p>To address this, it is requested that an additional requirement is included in Policy Infra3 along the following lines:</p>	<p><u>Modification to Policy Infra3 (to be inserted as f. and subsequent renumbering)</u></p> <p>f. Expecting all development proposals to be planned and designed to encourage more active and healthier lifestyles;</p> <p><u>New paragraph to be added to Reasoned Justification</u></p> <p>Designing developments to promote active and healthier lifestyles is central to creating sustainable communities. Incorporating walking, cycling, green spaces, and accessible sports facilities encourages daily activity, supports wellbeing, and reduces car dependency. Development proposals should have regard to the Sport England Active Design Guidance.</p>

Rep Number	Policy / Para ref	Sport England Reg 19 Position	Agreed position between CPBC and Sport England
		<p>“Expecting developments to be planned and designed to encourage more active and healthier lifestyles”</p> <p>It is also requested that the reasoned justification then provides a short explanation of the importance of planning and designing developments to encourage more active and healthier lifestyles. Sport England’s Active Design guidance can be signposted to for detailed advice on how this can be achieved in practice.</p>	

4. Areas Without Agreement (Uncommon Ground)

4.1 There are no areas without agreement.

5. Ongoing Cooperation

5.1 CPBC will continue to engage with Sport England in their role as a statutory consultee for plan making and planning applications.

5.2 Collaboration will continue through the ongoing work to update the Playing Pitch Strategy 2018 and Open Space Assessment 2023 and Built Facilities Needs Assessment and Strategy 2018.

5.3 CPBC and Sport England will also continue to work collaboratively with the Active Essex Place Partnership.

Signatories



For and on behalf of Castle Point Borough Council:

Name and Position: Amanda Parrott, Assistant Director, Climate and Growth

Date: 1 December 2025



For and on behalf of : Sport England

Name and Position: Roy Warren, Planning Manager

Date: 28th November 2025