

# Castle Point Housing Capacity Topic Paper August 2025



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### 1. Purpose of the Topic Paper

- 1.1. The purpose of this topic paper is to set out the evidence related to the capacity of Castle Point Borough to accommodate housing growth.
- 1.2. Castle Point Borough Council (CPBC) is a small local authority in Essex. The Borough consists of the urban areas of Canvey Island, Benfleet, Hadleigh, Thundersley and Daws Heath, which are surrounded by extensive Green Belt land. Castle Point is 17 sq miles in size and has a population density of 4,976 people per square mile. This population density is over four times the average population density in England which sits at around 1,134 people per square mile.
- 1.3. Castle Point has finite space, and this paper explores the potential housing capacity of the borough in that context. The topic paper utilises evidence gathered in the preparation of the Castle Point Plan to identify how much housing growth can be accommodated within the Borough considering the character of the local area and the various constraints that exist across the Borough. Constraints have been considered in accordance with national planning policy and relevant legislation.
- 1.4. The approach to development has evolved over time as a consequence of the outcomes of technical work, responses to the Issues and Options public consultation and significant changes to National Planning Policy.
- 1.5. Additionally, consideration has been given to the capacity of the housing market in Castle Point, and the potential to drive a step change in housing provision of the order expected by the Government's Standard Method for calculating housing targets for local areas. The housing target for Castle Point requires around a 700% increase in housing completions across the borough each year. The likelihood of this level of change being delivered across such a small area has been explored.

### 2. Planning Policy Historical Context

- 2.1. The Councils current Local Plan was adopted in November 1998 and was saved in its totality until 28th September 2007. Since that date only certain policies are still in place. The Council must give due weight to the 1998 Adopted Local Plan in accordance with the degree of consistency it has with the National Planning Policy Framework (NPPF). The closer the policies are in the Adopted Local Plan to those in the NPPF, the greater the weight they may be given.
- 2.2. Since this time, the Council has been working hard to prepare a New Local Plan for the Borough, producing several iterations that for different reasons were unable to progress. The most recent experience is summarised below.
- 2.3. In October 2020 the New Castle Point Local Plan Pre-submission Plan was submitted for examination.
- 2.4. After the examination, in accordance with Regulation 25 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Inspector issued their decision that the plan was found sound on 3rd March 2022.
- 2.5. At a cabinet meeting in June 2022 members resolved to not adopt, and to withdraw the Local Plan.
- 2.6. In November 2022 the Castle Point Plan Board was constituted to provide joint working arrangements between nominated Members (from all political parties) and officers. The Castle Point Plan Board has provided Member leadership and input into the evolution of the Castle Point Plan.
- 2.7. This Member led approach is intended to ensure that the plan reflects the wants and needs of the residents of Castle Point.
- 2.8. On the 30th November 2022 the council approved the resources and works necessary to secure the preparation of the Castle Point Plan. This has included early engagement in 2023 and an Issues and Options Consultation in July to September 2024.

### 3. Housing Requirement

- 3.1. Work on the Castle Point Plan commenced in late 2022. At that time, the NPPF allowed for Council's to set out exceptional circumstances whereby, evidence could be used to set local housing targets. The Council completed a <u>Local Housing Needs Assessment</u> in 2023, which looked at all the evidence and data available in relation to housing needs in Castle Point. This concluded that there were exceptional circumstances for identifying a local housing requirement. It identified a housing requirement of 255 homes per annum for the Borough. This work was accompanied by a telephone survey of over 500 local people to determine their needs in terms of housing sizes, types and tenures. This is a robust piece of work based on strong evidence.
- 3.2. The outcomes of this work were subject to consultation as part of the Issues and Options consultation in July-September 2024, and Duty to Cooperate discussions with our neighbouring authorities. There was a strong degree of local support for the robustness of the work undertaken and its resultant outcomes.
- 3.3. On updating the NPPF in December 2024, the Government removed the ability of Council's to use exceptional circumstances to calculate their own housing requirements. Additionally, they introduced a standard method based on increasing housing stock within an area, rather than on demographic and household projections. The standard methodology therefore no longer calculates likely housing need, but rather establishes a target based on growing the overall housing stock across the country, with an adjustment for affordability securing larger requirements in higher value housing market areas.
- 3.4. The consequence of this revised standard method is a requirement for 686 homes per annum in Castle Point. Because of the changes introduced by the NPPF in December 2024, this is the mandatory starting point for plan making in Castle Point. In accordance with the Planning Practise Guidance, this figure will remain under review during the plan making process and will need to take into account the annual updates of the housing stock estimates and affordability ratios as inputs to the standard method.
- 3.5. This requirement results in a need for around 11,662 homes over a 17-year period. This is substantially greater than the requirement identified through the Local Housing Needs Assessment of 5,100, or the standard method that existed before December 2024, which would have required around 350 homes per annum in the borough.
- This topic paper explores the ability of Castle Point to accommodate the housing requirement resulting from the NPPF December 2024.
- 3.7. The housing mix (sizes, types and tenures) identified through the Local Housing Needs Assessment 2023, was based on demographic growth and the delivery of around 5,100 homes over a 20-year period. As the standard method requirement for housing in Castle Point is not based on demographic growth and is substantially greater than projected, the housing mix requirements have therefore been reviewed.

3.8. The Local Housing Needs Assessment Update June 2025 identifies a total constrained housing requirement of 5,950 dwellings (350 per annum) for 2026-2043, of which 1,458 new homes need to be affordable. This equates to 86 affordable homes per annum across the plan period, or about 24% of the total supply. The Council's target is to deliver this quantum of affordable housing. There continues to be an overwhelming need for social-rent homes alongside a smaller but important need for affordable homes to buy. This is set out in the table 1 below.

Table 1: Overall need for market and affordable dwellings by property size

	Require Social Rent	Require Affordable Rent	Require Affordable to Own	Total Affordable Housing (Total columns 2-4)	Total Market Housing	Total (Total columns 5-6)
1 bedroom	204	15	76	295	218	513
2 bedrooms	243	15	151	409	756	1,165
3 bedrooms	372	36	134	542	2,143	2,684
4+ bedrooms	190	3	19	213	1,274	1,486
C2 Dwellings					102	102
TOTAL	1,009	69	380	1,458	4,492	5,950
1 bedroom	20.2%	21.2%	20.0%	20.2%	4.9%	8.6%
2 bedrooms	24.1%	22.2%	39.7%	28.0%	16.8%	19.6%
3 bedrooms	36.9%	52.4%	35.2%	37.2%	47.7%	45.1%
4+ bedrooms	18.9%	4.2%	5.1%	14.6%	28.4%	25.0%
C2 Dwellings					2.3%	1.7%

Source: Castle Point Local Housing Needs Assessment Update – June 2025 (ORS Housing Model).

3.9. Further detail is set out in the Housing Topic Paper July 2025.

### 4. Urban Capacity

- 4.1. Chapter 13 of the NPPF entitled Protecting Green Belt Land emphasises the importance of prioritising the reuse of previously developed land (brownfield sites) and urban intensification before considering release of Green Belt land.
- 4.2. This accords with the Councils agreement to commence the production of the Castle Point Plan based on the principle that it would prioritise brownfield land for housing development and protect and preserve the Green Belt.
- 4.3. Therefore, the first step taken was to understand how much capacity the existing urban areas of Castle Point had available for development.
- 4.4. An Urban Capacity Assessment was undertaken as part of the Borough-Wide Development Options Technical Paper<sup>1</sup> published in July 2024 to support the Issues and Options Consultation. This assessment established the maximum realistic number of new dwellings that could be delivered within the existing urban area, prior to considering any release of Green Belt land.
- 4.5. It set out a detailed and evidence-based assessment of the urban land available for housing development within the Borough. It quantifies and evaluates the capacity of the Borough's urban areas to accommodate new housing, in accordance with the requirements of the NPPF, Planning Practice Guidance (PPG), and relevant local plan-making regulations.
- 4.6. The key finding after considering all extant development, and all potential urban capacity is that there is a potential urban capacity to accommodate **3,730** new homes.
- 4.7. In order to determining the urban capacity within the Borough, the following sources of land supply were considered to establish what is suitable and available:
  - Completions
  - Extant permissions
  - Windfall
  - Call For Sites in early 2024
  - Allocated sites from the adopted 1998 Local Plan that have not been developed
  - Brownfield Land Register (BLR) sites
  - Strategic Housing Land Availability Assessment (SHLAA) 2018 sites <u>General Evidence</u> <u>Documents | CastlePoint</u>
  - Additional land identified by the Council
- 4.8. Only, sites that could accommodate more than 6 units were considered and assessed; this was based on a density assumption of 50 dwellings per hectare. For sites that fell below that threshold it was assumed that they would fall within the small sites windfall allowance. Additional modelling incorporated higher densities where appropriate, reflecting recent local examples of intensification.

<sup>&</sup>lt;sup>1</sup> Borough Wide Development Options Technical Paper, July 2024

- 4.9. To ensure accuracy in estimating capacity, sites were grouped into 13 geographic clusters. Each cluster was assigned a tailored density based on recent planning permissions and local development patterns. Examples include
  - Hadleigh Central: 125 dph
  - Canvey Town Centre East: 104 dph
  - South Benfleet Town Centre: 126 dph
  - Isolated sites not within a defined cluster were modelled at the borough-wide average density of 112 dph.
- 4.10. Following site identification, density modelling, and uncertainty discounting, the Council identified a further 2,204 potential dwellings from new urban development opportunities considered suitable. There is significant opportunity to enhance the quality of the built stock and environment within these areas whilst developing at enhanced densities for mixed use commercial and residential development.
- 4.11. The assessment reflects a comprehensive and transparent approach to identifying urban capacity, in line with national guidance. It provides a critical baseline for evaluating the sustainability, deliverability, and spatial implications of alternative growth strategies in the Castle Point Plan. Importantly, the assessment remains valid and applicable.
- 4.12. To further strengthen this evidence, and ensure that the most effective use of land is being made in accordance with Chapter 11 of the NPPF, a Density and Capacity Study was undertaken to determine site constraints and opportunities and high level urban design principles to justify the urban sites potential capacity. This allows an informed understanding of the maximum densities that the urban areas of the Borough can take, while still maintaining the unique character within Castle Point.
- 4.13. The study separated the Borough into 6 character areas which are able to take the following densities:

Table 2: Density by Character Area

Area	Density (dwellings per hectare)
Neighbourhood Hub	150
Primary Corridor	125
Suburban Corridor	100
Estuary Edge	70
Natural Edge	70
Canvey Seafront	100

- 4.14. As a result of the above, the site allocations and board locations identified within the Castle Point Plan, are able to deliver at total of 4,868 homes between 2026 and 2043.
- 4.15. The table below shows the urban sites allocated in the Castle Point Plan Regulation 19 Draft, detailing how the allocation will make best use of the urban capacity available.

Table 3: Castle Point Plan Regulation 19 Draft Site Allocations and Broad Locations Summary

Area	Policy Ref	Site	Minimum No. Units	Existing Use / Redevelopment Notes	Ownership
Benfleet	В3	Furniture Kingdom, London Road	48	Disused Warehouse (vacant for several years) that will not be retained so a net loss of employment floorspace.	Private
Benfleet	B5	Canvey Supply	81	Current employment use, but land is underused. Net loss of employment floorspace.	Private
Benfleet	B6	159-169 Church Road	40	Current shopping parade and garages. Shopping parade will be retained or redelivered to prevent loss. Proposals will have to provide sufficient parking to prevent loss.	Private
Benfleet	В7А	Richmond Avenue Car Park	27	Existing Car Park	Council Owned Land
Benfleet	В7В	Land Adjacent Villa Park, Tarmarisk	10	Land is adjacent to Villa Park Recreation Ground.	Council Owned Land
Benfleet	В7С	312-320 London Rd (Queen Bee's)	22	Site contains existing Nursery (Queen Bee's). Redevelopment will include a nursery as well as residential.	Private
Benfleet	B8	Manor Trading Estate	200	Whilst the Manor Trading Estate is well occupied, employment land review work indicates that the building stock and public realm is poor, and land use and development density is poor across the area. The site will require master planning to make better use of the area and will not result in a loss of	Private

Area	Policy Ref	Site	Minimum No. Units	Existing Use / Redevelopment Notes	Ownership
				employment on the site.	
Canvey	C1	Canvey TC	820	A Master Plan will be created to establish how the town centre can best achieve sustained economic growth whilst meeting local needs. This will include development of key sites including the Knightswick Centre, land at the Paddocks and 8 sites that have been identified through the SLAA to deliver at least 620 new homes. The additional 200 homes will be identified through the Master Plan.	Mix of Council Owned and Private Ownership
Canvey	C4	Land in the West of Canvey Island	2000	A master planned approach to the regeneration and renewal of west Canvey will be taken to optimise urban land use. Total area is 62 ha including 38ha of employment (7ha as retail park). Design approach to encourage renewal and regeneration and consolidate parking provision across site to improve land use. Will not result in a loss of employment, will seek an increase of 10% industrial floorspace, community facilities and residential. Car parking strategy to be provided to consolidate parking and meet EPOA Parking Guidance.	Mix of Council Owned and Private Ownership

Area	Policy Ref	Site	Minimum No. Units	Existing Use / Redevelopment Notes	Ownership
Canvey	C9	Land at the Point	185	Parts of site currently occupied by employment uses. Relocation of existing businesses to West Canvey which is better located for access. Site will be supported by a master plan.	Private
Canvey	C10A	Admiral Jellico	7	Brownfield site, no current uses.	Private
Canvey	C10B	Land Rear of North Avenue	28	No current use, infill development site.	Council Owned Land
Canvey	C10C	Essex Coach Works	12	Currently used as employment, brownfield redevelopment site. Will not be retained so a net loss of employment floorspace.	Private
Canvey	C10D	Former Council Offices, Long Road	48	Disused Building, brownfield redevelopment site.	Council Owned Land
Canvey	C10E	Corner of Little Gypps Road and Willow Close	7	No current use, infill development site.	Private
Canvey	C10F	Ozonia Gardens	17	No current use, infill development site.	Private
Canvey	C10G	Land between Station Road and Seaview Road	19	No current use, infill development site.	Council Owned Land
Hadleigh	Had1	Hadleigh Town Centre	388	Regeneration of the Town Centre through a new master plan. Development of four specific sites as identified through the SLAA to deliver 188 homes. The additional 200 homes will be identified through the master plan. Will include redevelopment of Hadleigh Island	Mix of Council Owned, County Council Owned and Private Ownership

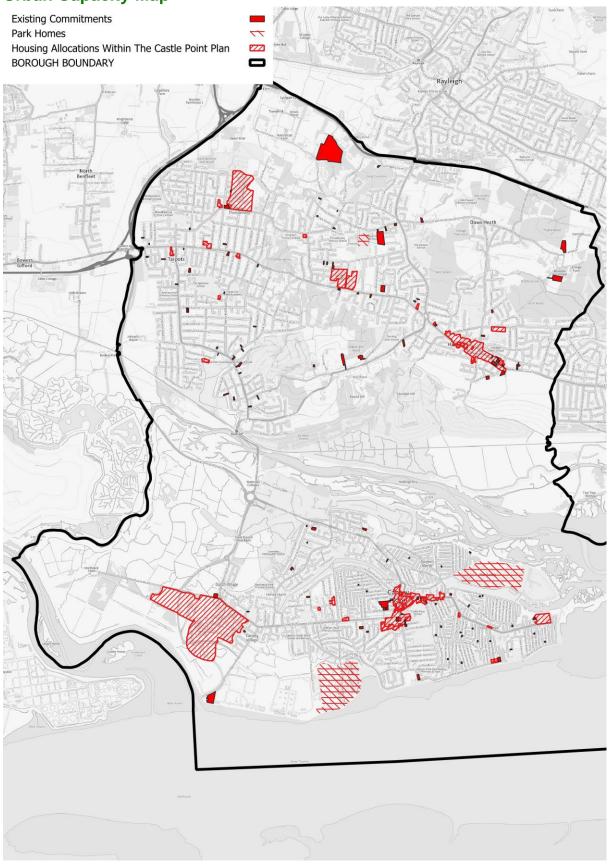
Area	Policy Ref	Site	Minimum No. Units	Existing Use / Redevelopment Notes	Ownership
				which includes vacant land owned by CPBC and under utilised land owned by ECC, will retain HOFS to better provide community uses. Consolidation of car parks to make better use of land and enable residential and commercial development.	
Hadleigh	Had3	Hadleigh Clinic, 49 London Road	14	No replacement for the existing use as a clinic required, as the policy will not come into effect until the NHS have confirmed the site is surplus to requirements and the services operating from this facility can be provided elsewhere nearby	NHS Owned
Hadleigh	Had4	Land South of Scrub Lane	114	Site is adjacent to Hadleigh Infant School and is vacant land surplus to education requirements.	County Council Owned
Thundersley	Thun2	Kiln Road Campus	730	The site will be brought forward in accordance with a master plan. The redevelopment will ensure the current community uses on the site will be re-provided and include a new shopping parade, alongside residential development. This site area specifically excludes the existing areas of open space to the north.	Mix of Council Owned and Private Ownership
Thundersley	Thun3	Thundersley clinic, Kenneth Road	24	No replacement for the existing use as a clinic as the policy will not come into effect until the NHS have confirmed the site is surplus to requirements and the services	NHS Owned

Area	Policy Ref	Site	Minimum No. Units	Existing Use / Redevelopment Notes	Ownership
				operating from this facility can be provided elsewhere nearby.	
Thundersley	Thun3	Thames Loose Leaf	27	Underused employment land. Employment use will not be retained so a net loss of employment floorspace.	Private

- 4.16. In addition to the site allocations and broad locations identified within the Castle Point Plan, existing commitments, Thorney Bay and Windfall Allowance (45 dwellings per annum) results in an overall total supply of 6,196 homes that can be delivered across the plan period.
- 4.17. This supply exceeds the locally assessed housing need of 5,100 dwellings<sup>2</sup>.
- 4.18. The Urban Capacity Study assessment demonstrates that the Borough's existing settlements cannot sustainably absorb 686 homes per annum. Doing so would result in:
  - Overdevelopment of urban areas
  - Loss of local character and amenity
  - Significant pressure on existing infrastructure and services
- 4.19. This reinforces the need for a lower, locally-justified housing requirement and supports a strategy of:
  - Prioritising urban intensification
  - Maximising sustainable brownfield opportunities
  - Minimising harm to the Green Belt and valued landscapes
- 4.20. An urban-first approach, grounded in clear evidence and local constraints, offers a deliverable and defensible spatial strategy for the Castle Point Plan.

<sup>&</sup>lt;sup>2</sup> Castle Point Local Housing Needs Assessment - Report of Findings for Castle Point, ORS, December 2023

### **Urban Capacity Map**



### 5. Housing Supply Position before Consideration of Green Belt

- 5.1. The housing supply calculations measure the change in stock between one year and the next, including losses and gains from new builds, conversions, changes of use (for example a residential house to an office) and demolitions. Net additions are comprised of 'new build completions' plus 'conversions' plus 'change of use' plus 'other net gains' minus 'demolitions'.
- 5.2. The Council has considered how the proposed rates of housing provision compare with recent rates of delivery. Table 1 below illustrates that over the past ten years, since 1 April 2015, 990 dwellings have been delivered, averaging 99 dwellings per annum within the Castle Point Plan area. This contrasts with an identified housing requirement of 701 dwellings per annum under the December 2024 revised standard methodology. This serves to underline the difficultly in meeting such high delivery rates in the Borough.

Monitoring Year	Net Additional Dwellings
2015/16	88
2016/17	84
2017/18	133
2018/19	173
2019/20	44
2020/21	144
2021/22	205
2022/23	156
2023/24	-58
2024/25	21
Total	990
Annual Average	99

Table 4: Housing Completions in Castle Point in the Past Ten Years

### Components of the supply

- 5.3. The Castle Point Plan Regulation 19 Draft approach is based on the housing land supply position as of 1 April 2025. This reflects the most up-to-date position available at the time of submission.
- 5.4. The overall housing supply position is set out in Table 2 below. A more detailed overview of the components of the supply is shown in the Housing Topic Paper (including the housing trajectory) and referenced in the following section.

Table 5: Housing Supply as 1 April 2025

Category	Number of dwellings
Committed sites with outstanding planning permission on both large and small site as at April 2025	480
Thorney Bay	173
Canvey Urban Sites proposed allocations	3,143
Benfleet Urban Sites proposed allocations	428
Hadleigh Urban Sites proposed allocation	516
Thundersley Urban Site proposed allocations	781
Windfall (small site allowance) @ 45 dwellings per annum	675
Total supply for the full Plan period (1 April 2025 to 31 March 2043)	6,196

5.5. The supply provides for 6,196 dwellings during 2025-2043.

### **Existing commitments**

- 5.6. Existing permissions for housing on unallocated sites will also contribute to the supply. On 1 April 2025 there were 480 homes that had planning permission or prior approval for permitted development.
- 5.7. Thorney Bay is an existing caravan park on Canvey Island. Currently, old style caravans are being removed from Thorney Bay Park and are being replaced with new style park homes. The replacement with new style park homes contributes to Council's housing supply. As of 1 April 2025, there are an additional 173 park homes to be delivered.

### Windfall

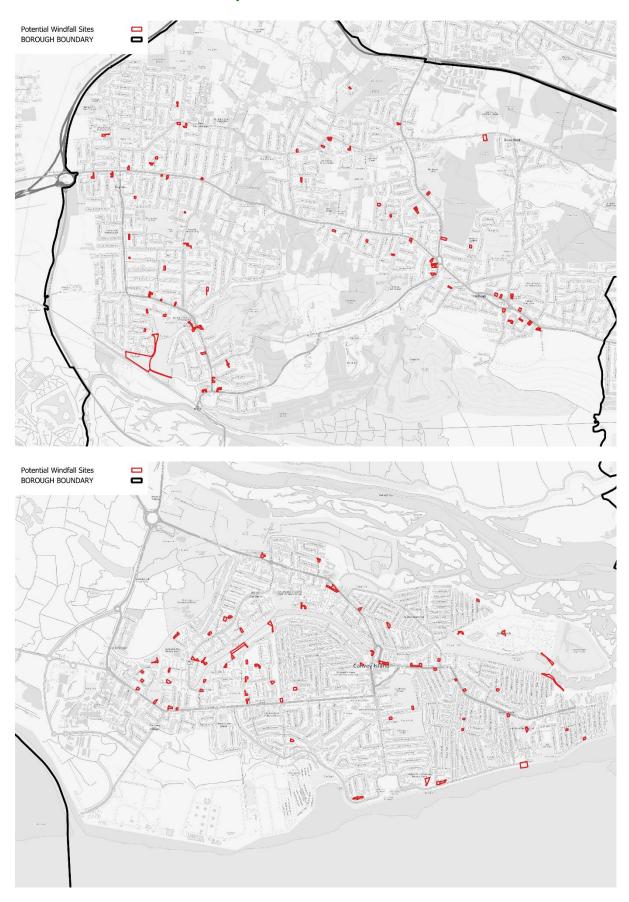
- 5.8. Windfall development comprises sites that have unexpectedly become available over time, and which were not anticipated by the Authority as part of a Local Plan.
- 5.9. Windfall completions and commitments can vary in size and type of development. The Council has actively sought to identify those sites which can accommodate more than five dwellings through its Strategic Land Availability Assessment (SLAA). To this end, the calculation of windfall for the purpose of the Castle Point Plan focuses on those sites that will deliver between 1 and 4 additional dwellings.
- 5.10. Table 6, below, identifies the number of homes delivered on sites of five dwellings or less during the period 2013 to 2025. This shows that historically, around 45 dwellings per year have been delivered on such sites.

Table 6:	Completions	on Sites of	5 or tewer ne	w homes

Year	Completions			
2015/16	49			
2016/17	55			
2017/18	53			
2018/19	62			
2019/20	60			
2020/21	66			
2021/22	28			
2022/23	48			
2023/24	26			
2024/25	15			
Total	462			
Annual Average	46			

- 5.11. Looking to the future, the initial work on the SLAA, which included a trawl of vacant and underused land and properties utilising AI software identified around 143 potential sites with a potential capacity of four homes or less. These sites could potentially deliver around 399 homes.
- 5.12. Given the potential capacity identified, it is appropriate to apply a windfall allowance of 45 dwellings per annum to the supply calculations for the Castle Point Plan, because there is evidence of sufficient potential supply to meet this over the plan period.

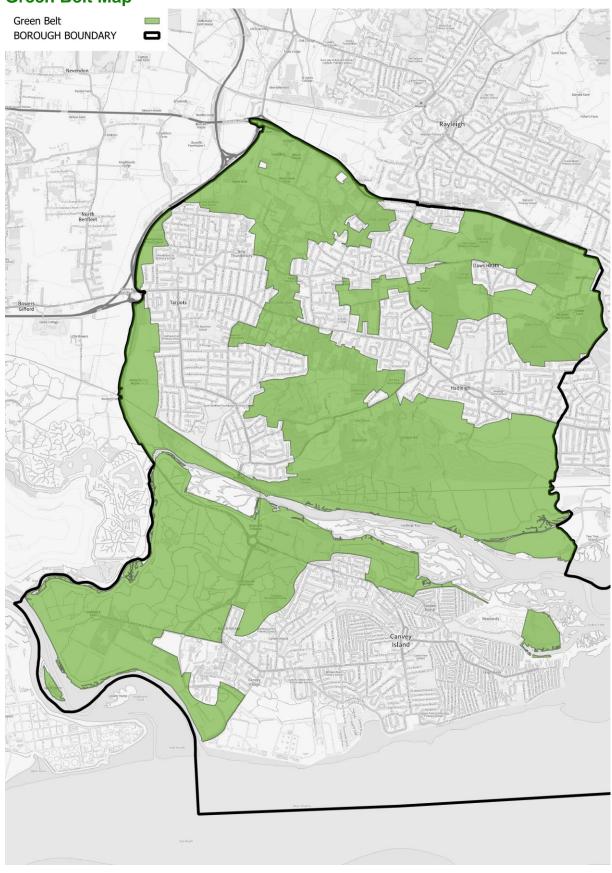
### **Potential Windfall Sites Maps**



### 6. Castle Point Green Belt

- 6.1. Castle Point Borough is located within the London Metropolitan Green Belt with approximately 53% of the borough designated as Green Belt. The only areas outside of the Green Belt are the urban areas (Canvey Island, Benfleet, Thundersley, Hadleigh and Daws Heath).
- 6.2. The Green Belt was last amended in 1998, as part of the currently adopted Castle Point Local Plan.
- 6.3. A Green Belt Assessment (Part 1) was completed in 2018 and supported the previously withdrawn Castle Point Local Plan.
- 6.4. As part of the evidence base to support the Castle Point Plan, a Green Belt Review has been prepared to reflect the revisions to the Green Belt PPG published on the 27 February 2025. This is reported in section 14 of this paper.

### **Green Belt Map**



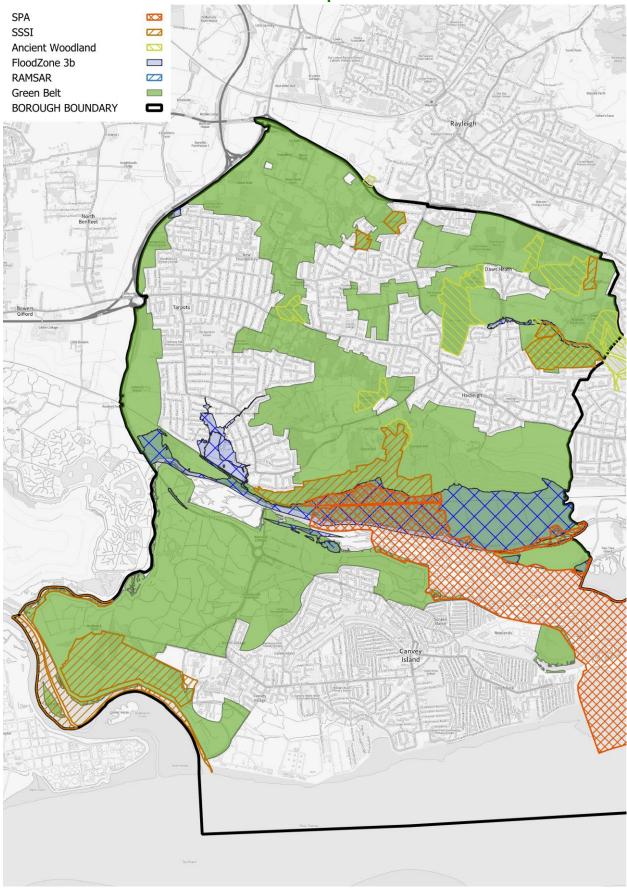
### 7. Land Constraints

- 7.1 When assessing sites for allocation within the Castle Point Plan, the Council must ensure that proposed development sites are deliverable and viable over the plan period in accordance with the NPPF. Constraints affecting the suitability of land for development are evaluated on a spectrum, acknowledging that not all constraints carry equal weight or represent absolute barriers.
- 7.2 These constraints cover a plethora of different environmental, regulatory, economic and social factors and some are more limiting than others. While some designations such as flood risk zones, protected habitats, or safeguarded infrastructure may preclude development, others can be addressed through strategic intervention, phased delivery, or other mitigation measures.
- 7.3 A single development site may be subject to a range of individual constraints which, in isolation, appear capable of mitigation. However, when assessed collectively, the cumulative impact of these constraints may render the site undeliverable or unviable, thereby compromising its suitability for allocation within the Local Plan.
- 7.4 Critical or strong constraints are generally considered the highest weighting which means that they are able to make a site entirely unsuitable for development and are often non-negotiable. These include but are not limited to; flood risk zones, protected heritage assets within the site and certain ecological designations.
- 7.5 Moderate constraints often require some level of mitigation but do not necessarily prevent a site from coming forward. These include but are not limited to; access to existing infrastructure, topography/ground conditions and proximity to heritage assets which may be able to be suitably mitigated.
- 7.6 Manageable constraints are generally able to be addressed through design or negotiation. These include but are not limited to; noise and some ecological factors.
- 7.7 The weighting applied to each constraint reflects its relative impact on site deliverability, viability, and alignment with wider spatial strategy objectives. High-impact constraints are typically non-negotiable and may trigger exclusion from allocation, whereas moderate or low-impact constraints are balanced against the wider objectives of the Plan, including housing supply, regeneration priorities, and infrastructure delivery. This approach ensures that planning decisions remain balanced, context-sensitive, and responsive to the evolving needs of communities.
- 7.8 The following chapters further detail the types of constraints that have been considered and how these apply within the context of Castle Point.

## 8. Strong Reasons for Resisting Development (Footnote 7 constraints)

- 8.1. Paragraph 11 of the NPPF is clear that there are some constraints that provide strong reasons for restricting the overall scale, type or distribution of development within a plan area.
- 8.2. Footnote 7 of the NPPF lists these constraints as being habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.
- 8.3. However, footnote 7 cannot be read alone. It must be read in the context of what the NPPF says in relation to each of these constraints. For example, if a development need is identified and unmet, the Green Belt can be reviewed through a Local Plan following certain steps. Another example is that the sequential and exception tests exist for flood risk, and there may be instances where flood risk is not therefore a strong reason for restricting development.
- 8.4. Therefore, as a starting point, strong reasons for restricting development based on NPPF footnote 7, have been identified in respect of the following constraints only:
  - Ramsar Sites
  - Special Protection Areas (Habitats Sites)
  - Sites of Special Scientific Interest (SSSI)
  - Ancient Woodland (irreplaceable habitat)
  - Flood Risk Zone 3b (Functional Flood Plain)
- 8.5. This is not to say that individual sites can't be excluded due to other footnote 7 constraints, but these are the constraints where there is a definitive position in the NPPF to resist residential development in almost all cases.
- 8.6. These constraints cover 22.8% of the borough's Green Belt area.

### **Castle Point Footnote 7 Constraints Map**

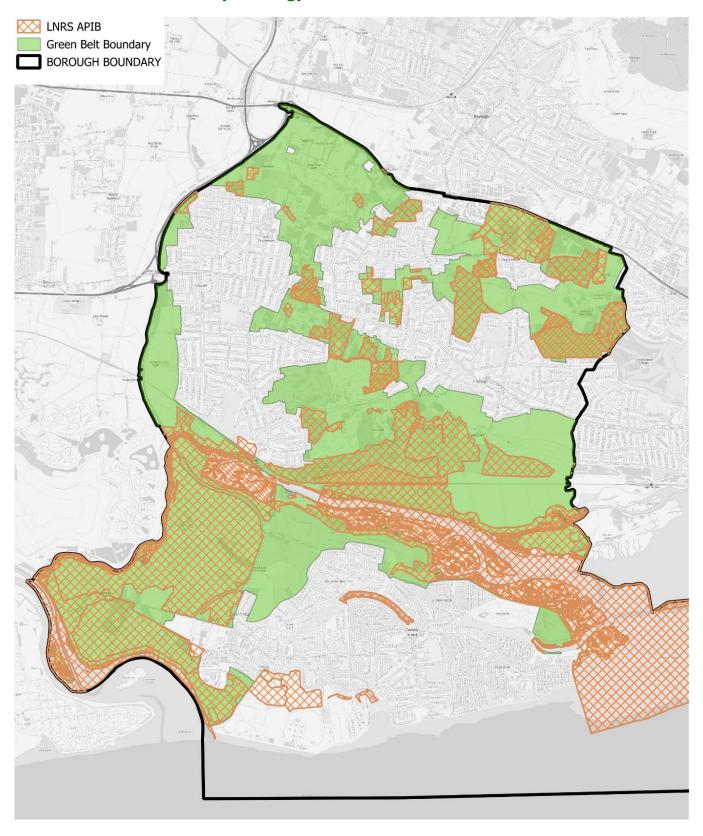


### 9. Protecting and Enhancing Biodiversity (NERC Act Requirements)

- 9.1. Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 was revised by the Environment Act 2021 to place on public authorities the general biodiversity objective, which is to conserve and enhance biodiversity. In doing so, public authorities are required to set policies which further the general biodiversity objective, and in doing so have regard to the Local Nature Recovery Strategy (LNRS).
- 9.2. Essex County Council is responsible for the preparation of a Local Nature Recovery Strategy for the Greater Essex area. The Essex Local Nature Recovery Strategy was adopted in June 2025 and published July 2025.
- 9.3. The LNRS for Greater Essex has mapped areas of particular importance for biodiversity (APIBs) across Essex. This identifies areas which are most important to protect, preserve and enhance biodiversity. This mapping is based around mapping of priority habitats and priority species.
- 9.4. The LNRS has also, for the purpose of encouraging nature recovery, identified strategic habitat creation opportunity areas where new habitats could be created to enhance and connect the network of habitats across the County. These areas provide the best opportunity for future biodiversity enhancement, and represent the top 15% of areas where such opportunities could be created in Essex. The strategic creation opportunity areas in Castle Point are identified for their potential to deliver priority grassland, woodland and still freshwater habitats.
- 9.5. It is these APIBs and strategic habitat creation opportunity areas which will deliver the conservation and enhancement of biodiversity across Essex, and which need to be reflected in the policies and proposals within the Castle Point Plan.
- 9.6. While the APIBs identified provides a strong reason to constrain growth, as they represent priority habitats that require conservation in accordance with the NERC Act 2006, the strategic opportunity areas on their own do not automatically require protection from development. It should however be recognised that the strategic opportunity areas are identified because they represent the 15% best opportunities for improving nature conservation across the whole of Greater Essex. Castle Point therefore has a critical role in delivering the LNRS and securing enhancements to nature conservation and biodiversity outcomes, required by the NERC Act, within the Countywide context.
- 9.7. The role of Castle Point in terms of nature conservation and recreation was also recognised in the Green and Blue Infrastructure Study prepared for South Essex in 2020. Since that time the Environment Act has made changes to the NERC Act, introducing the requirement for biodiversity to be enhanced, and for the preparation of Local Nature Recovery Strategies.
- 9.8. Therefore, the appendix to the South Essex Green and Blue Infrastructure Study has been updated for Castle Point to reflect this updated legal context, and the outcomes of the Essex LNRS and other updated evidence related to green infrastructure. This work sets out a Green and Blue Infrastructure Strategy at a landscape scale for Castle Point which highlights

- the role green open spaces play in delivering nature conservation and recreation outcomes in Castle Point that contribute not just to the wellbeing of the environment, but also to the wellbeing of residents.
- 9.9. Utilising the Essex LNRS in this way and using it to inform the Green and Blue Infrastructure Strategy for Castle Point, is consistent with the NPPF, which expects Council's to take a strategic approach to maintaining and enhancing networks of habitat and green infrastructure and plan for the enhancement of natural capital at a catchment or landscape scale.
- 9.10. Taking into account the LNRS and the Green and Blue Infrastructure Strategy in this way is also consistent with the NPPF in terms of the expectation that allocations for development are on land with the least environmental or amenity value.

### **Local Nature Recovery Strategy APIBS**



# **Local Nature Recovery Strategy – Strategic Opportunity Areas** LNRS Strategic Habitats Creation Opportunity Areas BOROUGH BOUNDARY

### 10. Protecting Public Open Space

- 10.1. The NPPF is clear that planning policies should be based on robust and up-to-date assessment of the need for open space, sport and recreation facilities. It is also clear that existing open space, sports and recreational buildings and land, including playing fields and formal play spaces should not be built upon for housing unless there are shown by an assessment to be surplus to requirements, or can be better provided elsewhere (quality and quantity).
- 10.2. Furthermore, one of the 'golden rules' in terms of permitting development in the Green Belt is around the provision of new or improvement public open space, so it would be perverse to permit development on such spaces, if the goal of Green Belt policy is to create more.
- 10.3. An Open Space Assessment was undertaken in 2023, looking at 311 open space sites in Castle Point. Table 7 below is an extract from that report setting out the different types of open space identified.

Typology	Number of Sites	На	Ha/1000	Minimum Size (ha)	Maximum Size (ha)	Average Size (ha)
Allotments	8	7.24	0.08	0.11	2.24	0.91
Amenity Green Space (>0.1Ha)	56	47.01	0.52	0.10	7.26	0.84
Parks and Recreation Grounds (combined)	19	102.58	1.14	0.28	25.09	6.42
Parks and Recreation Grounds	17	101.70	1.13	0.06	24.43	5.98
Outdoor Sport (Fixed)	2	0.88	0.01	0.22	0.66	0.44
Play Space (Child)	24	2.52	0.03	0.01	0.53	0.10
Play Space (Youth)	10	1.04	0.01	0.00	0.49	0.10
Accessible Natural Green Space	27	854.61	9.45	1.15	257.67	31.65
Small Amenity Green Space (<0.1ha)	97	3.89	0.04	0.01	0.24	0.04
Churchyards and Cemeteries	8	13.68	0.15	0.07	4.78	1.71
Education	28	94.34	1.05	0.60	14.93	3.37
Green/Blue Corridors	16	84.48	0.94	0.04	38.63	5.28
Outdoor Bathing	2	0.47	0.01	0.22	0.25	0.24
Outdoor Sport (Private)	11	113.14	1.26	0.14	60.08	10.29

Table 7: Existing Open Space Provision in Castle Point

- 10.4. Existing provision was assessed in terms of its quality, and quantity and accessibility standards were developed for the most common types of open space. This highlighted gaps in provision across the Borough in terms of allotment provision, amenity green space, parks and recreation grounds, play space and accessible natural green space. There is not therefore a surplus of open space provision, and indeed accessibility is poor in some of the Borough's most deprived wards on Canvey Island.
- 10.5. Based on this deficit there is a need for additional open space moving forward. Based on the Local Housing Needs Assessment requirement of 5,100 homes, the Open Space Assessment identified a requirement for 47ha of additional open space comprising:
  - Allotments: 2.45ha

• Amenity Green Space: 7.34ha

Parks and recreation grounds: 13.46ha

Play space (children): 0.87haPlay space (youth): 0.87ha

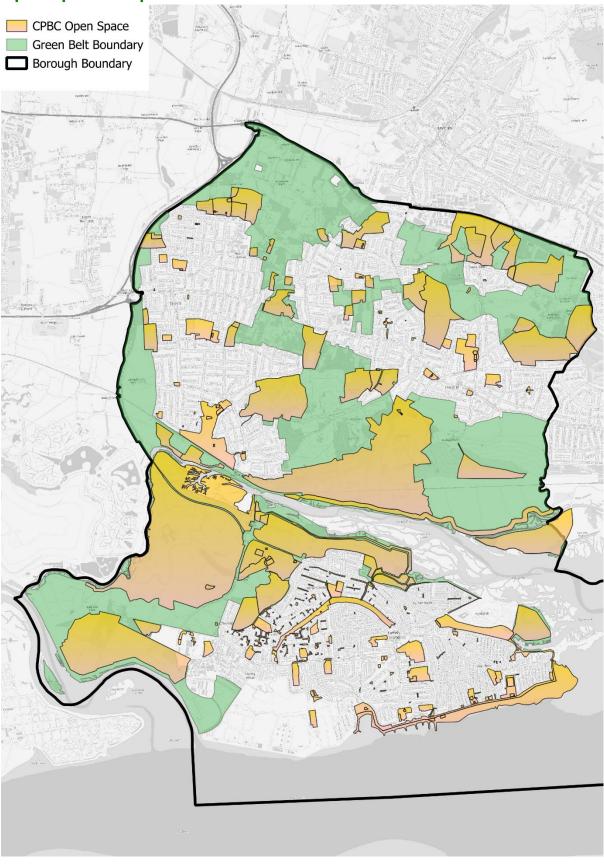
Accessible Natural Green Space: 22.03ha

- 10.6. If the standards in the Open Space Assessment were applied to the standard method requirement from the NPPF of 701 homes per annum, this requirement increases to 110ha over a 17-year period from 2026 to 2043.
- 10.7. Given both the deficits that exist in terms of existing provision and the need for additional open space of at least 47ha, rising to up to 110ha based on the standard method requirement, it is critical that open spaces are protected to meet the needs of the local population and the existing use of land as public open space is therefore a strong constraint in terms of restricting development.
- 10.8. The Green and Blue Infrastructure Strategy which looks at the role of green infrastructure in Castle Point at a landscape scale has integrated the findings of the Open Space Assessment, and has highlighted the key role the existing green infrastructure network will have in addressing deficits in open space provision, improving the health and wellbeing outcomes of local residents.

### **Ongoing Work**

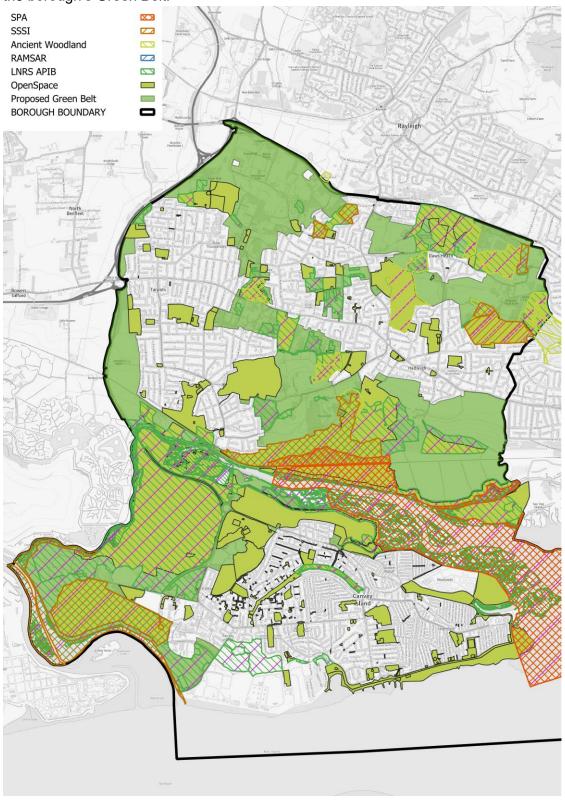
- 10.9. The Council last prepared a Playing Pitch Assessment and Strategy in 2018. This was accompanied by a Built Indoor Facilities Strategy for indoor sports. Since that time a stakeholder group has operated and updated to both assessments were reported and agreed by the Council in 2022 and 2023. These show a particular deficit within the borough for football pitches. There are smaller deficits for some other sports.
- 10.10 A full update to the Playing Pitch Assessment and Strategy is underway and due to be completed in the Autumn. Surveys for winter sports, including football have however been completed, and it is the case that a significant deficit remains in relation to football. This ongoing work will further highlight the need for playing pitches to be a strong constraint in terms of restricting development.

### **Open Spaces Map**



### 11. Combined Constraints Map

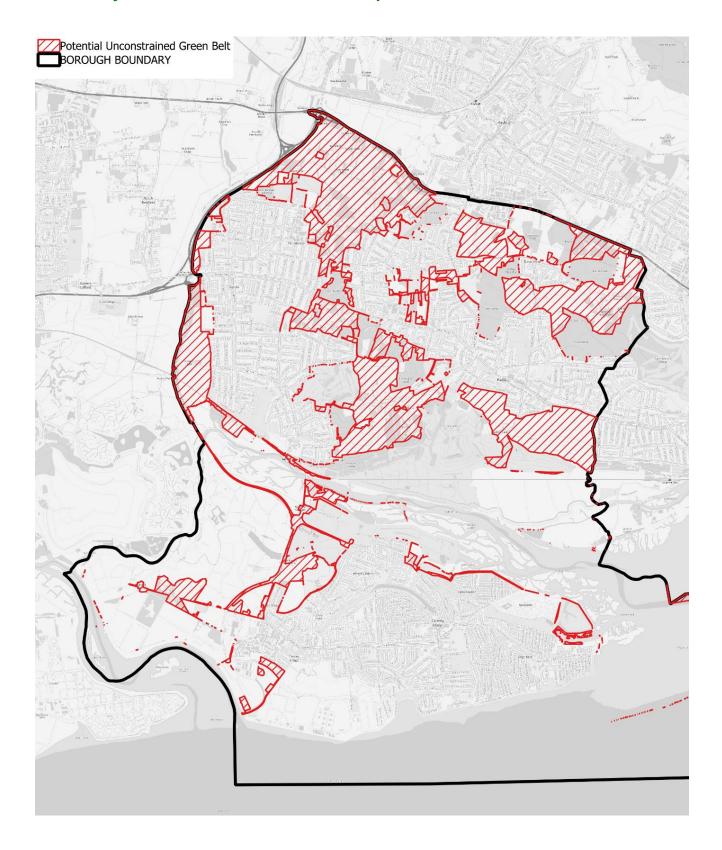
11.1Taking all the critical or strong constraints identified above, these cover around 1,824ha of the borough's Green Belt.



### 12. Potentially unconstrained Green Belt

- 12.1 The combined constraints map shows that around 1,824ha of the Borough's Green Belt is constrained by footnote 7 constraints or is otherwise constrained by nature conservation constraints or open space constraints which mean that there is a strong reason for resisting development.
- 12.2 There remains around 722ha of the Borough's Green Belt which is not affected by these constraints, and which may potentially be unconstrained, and which may be suitable for the consideration of development.
- 12.3 However, at this stage we have not looked at the sustainability of locations to accommodate growth. The NPPF is clear that development sites should be sustainably located to be identified and brought forward for development.
- 12.4 Furthermore, we have not looked at the Green Belt in its own right. Green Belt is a policy constraint which seeks to contain urban areas and protect open land including the countryside around towns from development. A Green Belt Review has been undertaken to assess the impact of development on the Green Belt.
- 12.5 Even at that stage it may not be appropriate to develop sites. So far, we have only looked at borough wide constraints, and strong constraints that may stand on their own. We have not looked at those constraints which may not on their own be a strong reason for limiting development but when combined with other reasons may form part of a reason. This would include the strategic habitat creation opportunity areas from the LNRS, but also flood risk and the sequential approach.
- 12.6 We have also not looked at locally specific constraints such as landscape or heritage assets, which may prevent the development of some sites.
- 12.7 Finally, there is an expectation that sites identified through a Plan are deliverable or developable, or capable of being made so. It is therefore also important to consider the availability and potential developability of land.
- 12.8 It is therefore unlikely that all those areas of the Green Belt identified as being potentially unconstrained are unconstrained in reality, and it is also unlikely that all those areas would be developed within the plan period. The further sections of this report explore these matters.

### **Potentially Unconstrainted Green Belt Map**

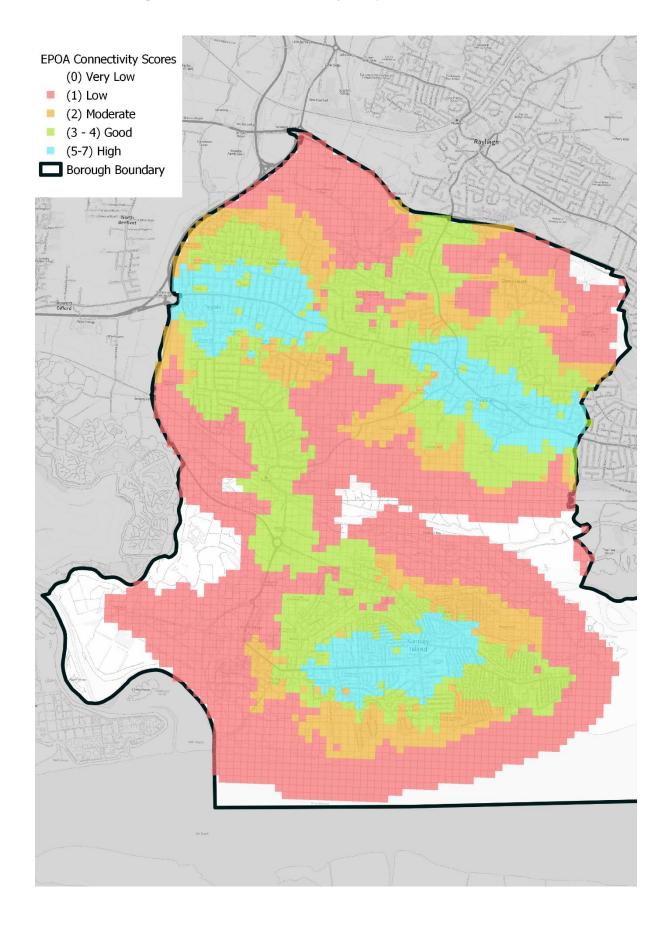


### 12. Sustainable Accessibility

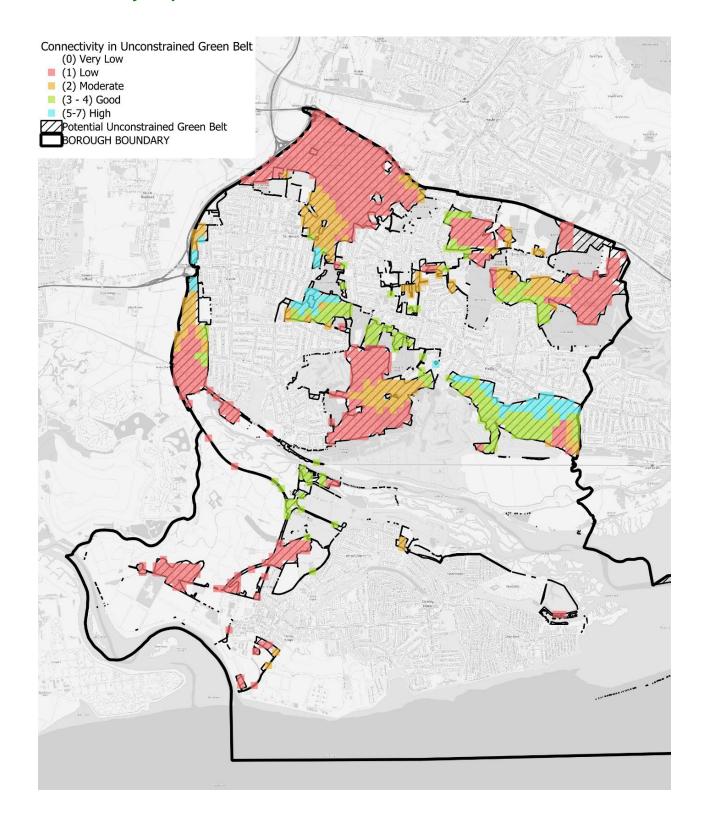
- 12.1 The NPPF is clear that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a sites location would be appropriate for the kind of development proposed. Specific reference is made to the transport section of the NPPF in this regard, with the need to consider opportunities to maximise sustainable transport solutions emphasised in terms of determining the sustainability of sites.
- 12.2 The transport section of the NPPF indicates that when Councils are assessing sites for allocation in development plans they should ensure that access to sustainable transport modes is prioritised, that there is safe and suitable access to sites for all users, that the design of streets and transport aspects of the scheme meet national design requirements and that any significant impacts on the transport network can be cost effectively mitigated to an acceptable degree.
- 12.3 Work has recently been completed on new Parking Guidance for Essex. As part of this work, connectivity mapping was prepared, similar to the PTAL used in Greater London. This mapping identifies areas with high connectivity to services and public transport, and those areas where connectivity is poor. Whilst not intended for use in this way, this mapping provides a useful starting point for considering the sustainable accessibility of sites. It shows that some of the Borough's Green Belt has good to moderate connectivity. However, there are areas of the Borough's Green Belt which have very poor connectivity.
- 12.4 A Transport Assessment Scoping Report was prepared in 2024. This identified the existing conditions on the transport network, and established an initial schedule of interventions for helping to ease congestion and to facilitate growth. As part of this work, the Green Belt site options identified in the Issues and Options Document were considered. This highlighted issues with access to the north west of Thundersley. For the remaining sites it set out the relationship between the site and public transport and active travel nodes. It also noted the condition at the nearest junction on the highway network. This work was not conclusive in itself, but provides the basis for further work.
- 12.5 A Transport Assessment has now been prepared for the urban sites identified in the Castle Point Plan. This assessment utilised the South Essex Transport Model. This builds in background growth for the neighbouring boroughs, city and districts so that cumulative impacts can be identified. Based on just the growth in the Castle Point Plan Regulation 19 Draft, the traffic situation is expected to worsen, with congestion at some points on the strategic road network expected to become severe. Growth above this level is therefore expected to have a greater impact.
- 12.6 To determine if the Green Belt Sites promoted to the Council could meet the requirements of paragraphs 110 and 115 of the NPPF, a site level sustainability and accessibility assessment was commissioned to consistently and robustly assess the sustainability of each Green Belt site's location on the transport network, and to determine through highway design if the site can be accessed by all users in a safe way, considering national design requirements.

- 12.7 To manage the impact of growth on transport capacity, it is important that sites are sustainably located so people are located close to services, and that they have a choice of transport options in addition to the car i.e. buses, rail, walking and cycling. It is not expected that this will prevent every journey by car, but that it will mean some journeys are taken by other means reducing the overall impact.
- 12.8 By concentrating development in town centres and on transport corridors the densities in these locations increases to the extent that a critical mass of people develops. This makes shops and services more viable, and improves the viability and feasibility of public transport and cycling measures.
- 12.9 Sites located away from town centres and transport corridors, on the edge of settlements do not have ready access to services or public transport provision and do not contribute towards this critical mass. They are therefore more likely to be reliant on private vehicles, adding to the transport capacity issues. Whilst bespoke measures could be put in place to provide new developments in such locations with travel options, in the absence of the necessary critical mass, there is a risk that the provision will fall away once developer subsidy ends. Typically, edge of town Green Belt sites have been promoted to the Council at circa 30-40 dwellings per hectare. This is not likely to be sufficient to sustain bespoke services long term. The work concluded that the majority of the sites promoted to the Council would generate additional traffic and that the introduction of sustainable travel measures would not result in a shift to sustainable travel modes by occupants. The sites would therefore add to the severe traffic conditions at some junctions without providing mitigation or constraint of impact.
- 12.10The work also concluded that many of the sites are accessible from residential side roads which do not meet the current standards, and do not provide safe access to these sites for all users, especially when a significant intensification of use is being sought which would impact on existing residents.
- 12.11 Furthermore, the Council has reviewed the option of providing a new settlement/significant urban extension to the North West of Thundersley, as a new urban centre could potentially be created in this location. For principally transport and accessibility reasons it is not considered that this is a deliverable option, as the transport interventions required would have too significant an impact on the strategic road network and are not considered to be financially viable. This is an agreed position with the Highway and Transportation Authority, Essex County Council.
- 12.12It is therefore appropriate and in accordance with the NPPF to avoid development in the Green Belt as it would not be sustainably located and would impact on traffic capacity on the local and strategic highway network. This is consistent with paragraphs 110 and 115 of the NPPF.

## **Essex Parking Guidance Connectivity Map**



# Potentially Unconstrained Green Belt and Essex Parking Guidance Connectivity Map



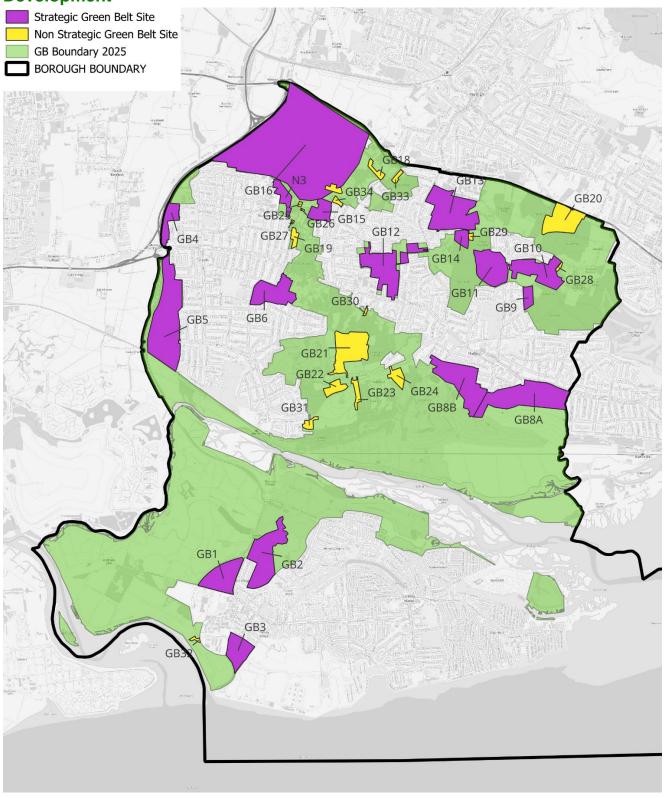
#### 13. Submitted Green Belt Sites

- 13.1 Through the Call for Sites which took place early in 2023 and alongside the Issues and Options Consultation, 262 sites within the Green Belt were promoted to the Council for consideration for development for housing. The Green Belt sites which were allocated in the previously withdrawn local plan have also been considered through the SLAA, were they have been promoted for development through the latest Call for Sites. These include sites GB1, GB2, GB4, GB6, GB9, GB12, GB15, and GB31.
- 13.2 Green Belt sites promoted through the Call for Sites were reviewed and where possible clusters were used to create potential sites for consideration through the plan-making process. Any remaining sites which sat outside a cluster, and which either were not contiguous with the existing urban area or had a capacity of less than 100 homes were removed from consideration. This resulted in 16 Green Belt sites being presented for consideration through the Issues and Options Document.
- 13.3 Following the Issues and Options Consultation, the owners of Boyce Hill Golf Course (GB7) subsequently contacted the council to confirm that the site was no longer available for development. Therefore, no further assessment of this site has been undertaken.
- 13.4 Ignoring constraints, these sites have a total combined capacity of around 5,855 homes, plus around 33,750 sqm of employment floorspace, as one site was promoted for employment only.
- 13.5 However, when the combined constraints which indicate that there is a strong reason for resisting development are considered, a significant number of these sites fall away in their entirety or in part. Overall, just 104ha of these sites falls within potentially unconstrained Green Belt. This indicates a potential capacity of 3,120 homes based on 30 dwellings per hectare.
- 13.6 It should be noted that this capacity is before wider constraints, and site level considerations of constraints are applied, which may limit development further or entirely. It is however also before a design-based approach is applied to any suitable sites which may enable higher density development to be secured, which could equally improve capacity.
- 13.7 Sustainability considerations also affect the level of housing capacity available. Several of the sites, are in areas of poor connectivity. If it cannot be demonstrated that these connectivity issues can be cost effectively overcome, then these sites would not constitute a sustainable development locations in terms of the NPPF. The transport evidence set out in the previous section indicates that this would be unlikely to be achieved in many cases. It also indicates that the outcomes of allocating sites in the Green Belt would be to worsen conditions further at locations where transport conditions are severe.
- 13.8 Due to the changes to the NPPF in December 2024, the starting point for identifying suitable Green Belt sites has changed. Therefore, it is necessary to bring all those sites which are not contiguous with the urban area into the assessment, along with any small sites being promoted.

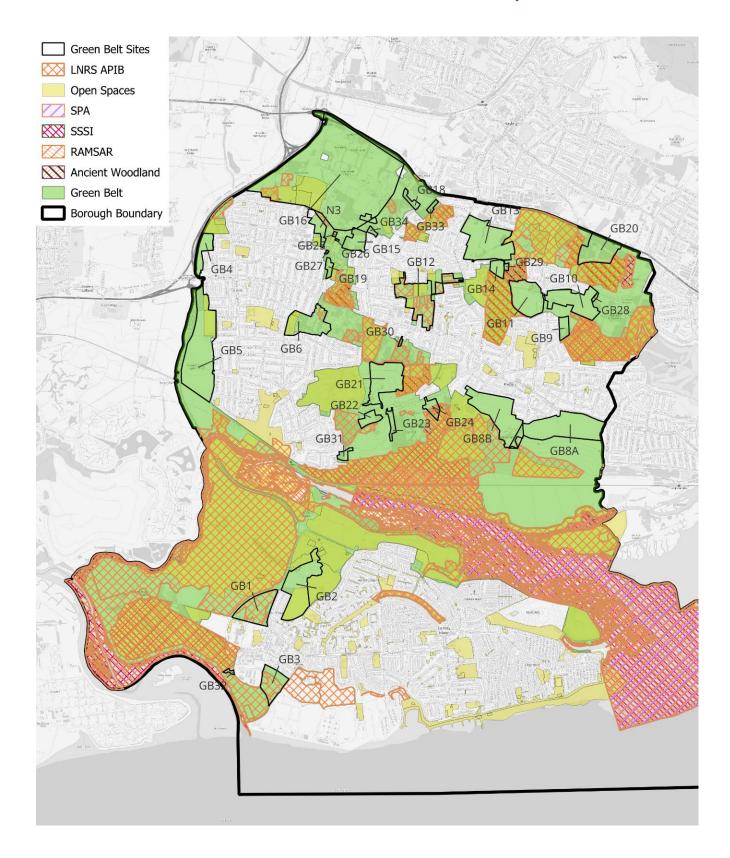
- 13.9 To this end, an additional 17 clusters of sites or individual sites have been identified for further consideration with a potential capacity of 1,758 homes at 40 dwellings per hectare.
- 13.10 Overall 34 Green Belt sites have been identified for further consideration. There are listed in the table below. They have been appraised through the SLAA in terms of sustainable accessibility and mapped against constraints to determine their potential suitability for development. The SLAA Overview Report provides more detail on this.

Site	Site Name
Reference	
GB1	West of Canvey Road
GB2	East of Canvey Road
GB3	Land South of Charfleets
GB4	Land off Glebelands
GB5	West of Benfleet (Jotmans)
GB6	Land between Felstead Road and Catherine Road
GB8	South of Hadleigh
GB9	Oak Tree Farm
GB10	South East of Daws Heath (Brook Farm)
GB11	South West of Daws Heath (Solby Wood)
GB12	The Chase
GB13	East of Rayleigh Road
GB14	South of Daws Heath Road
GB15	North of Grasmere Road
GB16	NW Thundersley (Broad Location)
NR3	East of Manor Trading Estate
GB17	Land off Grange Road
GB18	Land off Goldfinch Lane
GB19	Land North of Thundersley Church Road and East of Downer Road
	North
GB20	Land to the East of St Michaels Road
GB21	Land off Hill Top Avenue
GB22	Land Between Essex Way and Vicarage Hill
GB23	Land to the rear of 329 Benfleet Road
GB24	Land off Shipwrights Close
GB25	Land to rear of Beaucroft and Sunray, Bassenthwaite Road
GB26	Land between Glen Haven and Ye Oaks, Bassenthwaite Road
GB27	Land Adjacent 298 Church Road
GB28	170 Bramble Road
GB29	Ragwood Riding Centre, Daws Heath Road
GB30	Land off Netherfield
GB31	Land off Glyders
GB32	Land south of Fleet Roundabout, Roscommon Way
GB33	Land west of Kingsley Lane
GB34	Grandview Stables, Grandview Road

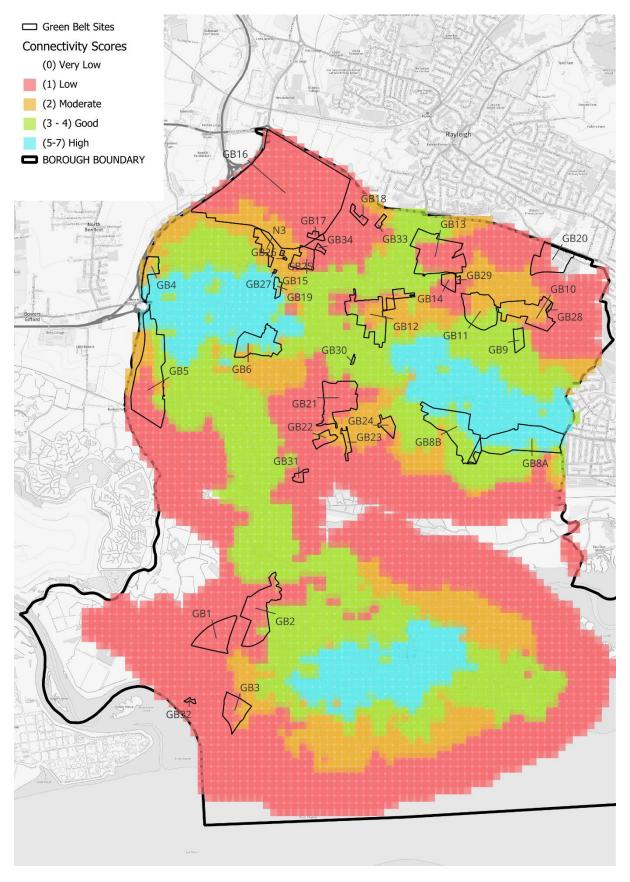
# **Green Belt Sites Submitted to the Council for Consideration for Housing Development**



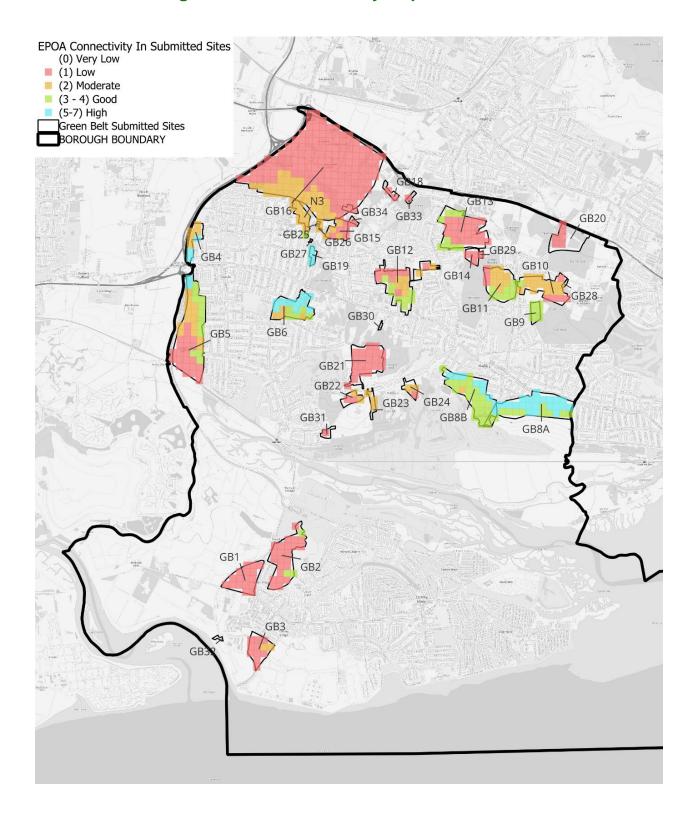
## **Combined Constraints and Submitted Green Belt Sites Map**



## **Submitted Green Belt Sites and Essex Parking Guidance Connectivity Map**



## **Submitted Green Belt Sites and Potentially Unconstrained Green Belt and Essex Parking Guidance Connectivity Map**

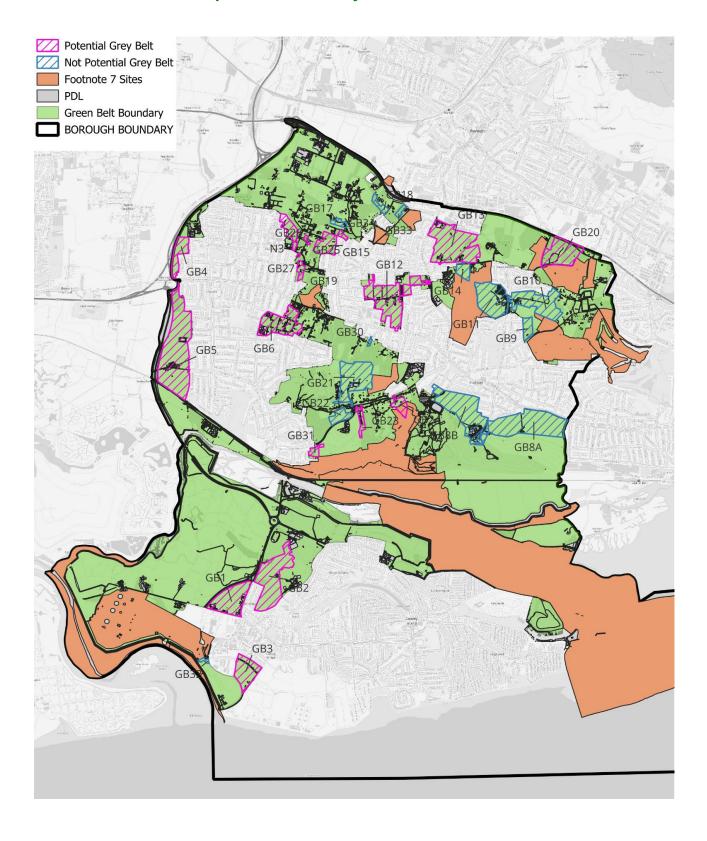


#### 14. Green Belt Review

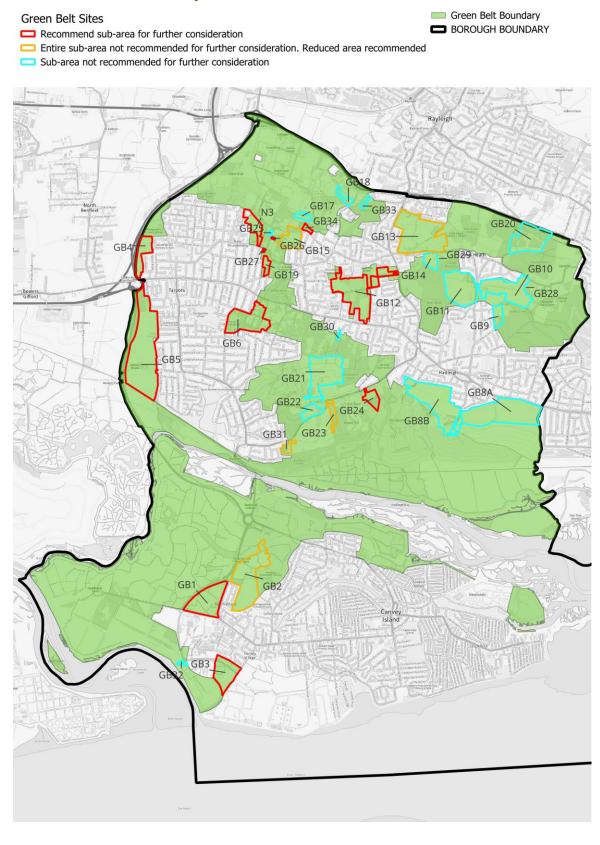
- 14.1 A Green Belt Review has been prepared for Castle Point. This has been prepared in accordance with the updated Green Belt Planning Practice Guidance issued on 27 February 2025. This Green Belt Review does four key things:
  - Reviews the Green Belt Review Part 1 undertaken in 2018, to determine if it is an appropriate basis for an updated Green Belt Review;
  - Identifies potential Grey Belt, looking at the distribution of previously developed land and the tests of grey belt set out in the NPPF 2024;
  - Identifies potential Green Belt boundary anomalies that should be addressed through a local plan review; and
  - Assesses the impact on the Green Belt of development on those sites promoted, to determine if they should be considered for inclusion in the Castle Point Plan from a Green Belt perspective.
- 14.2 That work determined that for North West Thundersley (GB16), due to it being 160ha and had been assessed at a parcel level (parcel 1) in the Green Belt Review Part 1 (2018) and due to its fragmented land ownership, varied planning history and context relating to individual sites within GB16, it was inappropriate to assess the site as sub area.
- 14.3 Of the remaining 33 sites being considered, it was recommended that 14 should be excluded from further consideration, only parts of 5 further sites should be considered, and the remaining 12 should continue to be considered further<sup>3</sup>. Those sites which were recommended for further consideration in whole or in part have a capacity of around 3,792 homes only, which, combined with the 6,196 total supply including urban sites amounts to 9,998 homes which would still not address the full 11,662 requirement arising from the standard methodology.

<sup>&</sup>lt;sup>3</sup> It should be noted that in two instances, two sites have been assessed together in the Green Belt Review. These are sites GB10 and GB28, and GB14 and GB29.

## **Green Belt Review Map – Potential Grey Belt**



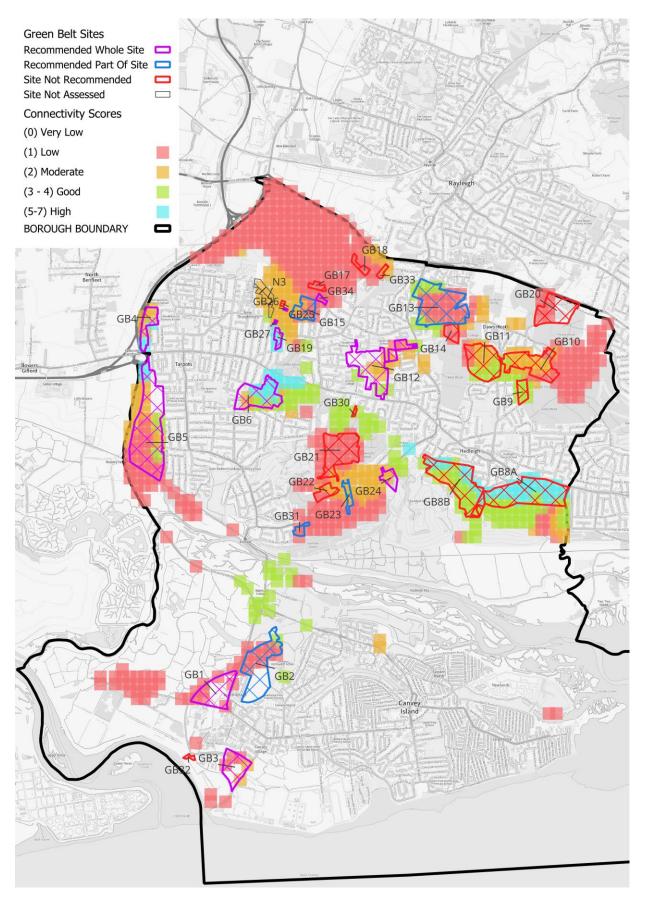
## **Green Belt Review Map - Site Assessments**



## 15. Potentially Unconstrained Green Belt and the Green Belt Review

- 15.1 The following map shows how the areas of potentially unconstrained Green Belt overlap with sustainable accessibility for those sites recommended for further consideration as part of the Green Belt Review.
- 15.2 When areas with poor connectivity (red) are excluded, there remains around 96ha only that could be considered for development in sites that were submitted which are within the Green Belt. This is sufficient to provide around 2,880 homes only.
- 15.3 It should be noted that whilst those sites identified are potentially suitable, they will need to be considered further in terms of site-specific constraints. The next section details where there might be additional constraints to be applied to specific sites.
- 15.4 There will also be a need, to determine if such sites can be supported by the infrastructure available. Specifically, it is necessary to determine if they can be accommodated within transport networks cost effectively, to the extent that any significant impacts are mitigated to an acceptable degree. The transport evidence set out in the previous section indicates that this would be unlikely to be achieved in many cases. It also indicates that the outcomes of allocating sites in the Green Belt would be to worsen conditions further at locations where transport conditions are severe.

## **Green Belt Sites Recommended for further consideration Map**



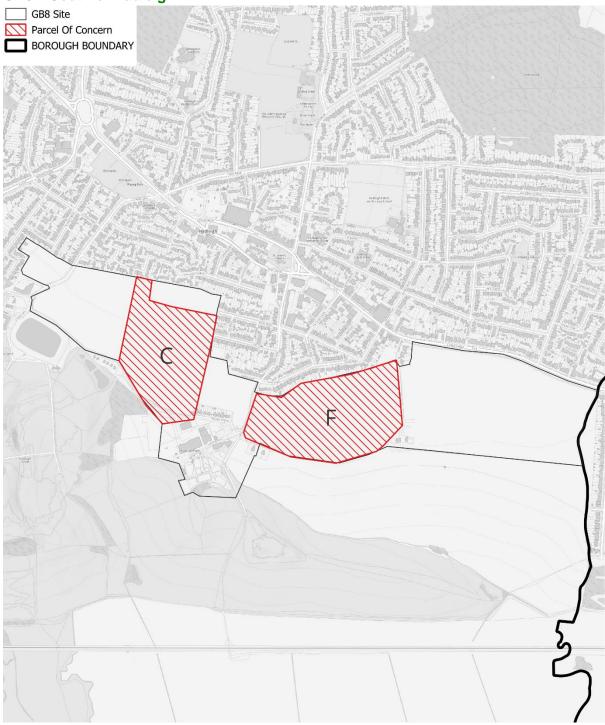
### 16. Other Considerations – Site Specific Constraints

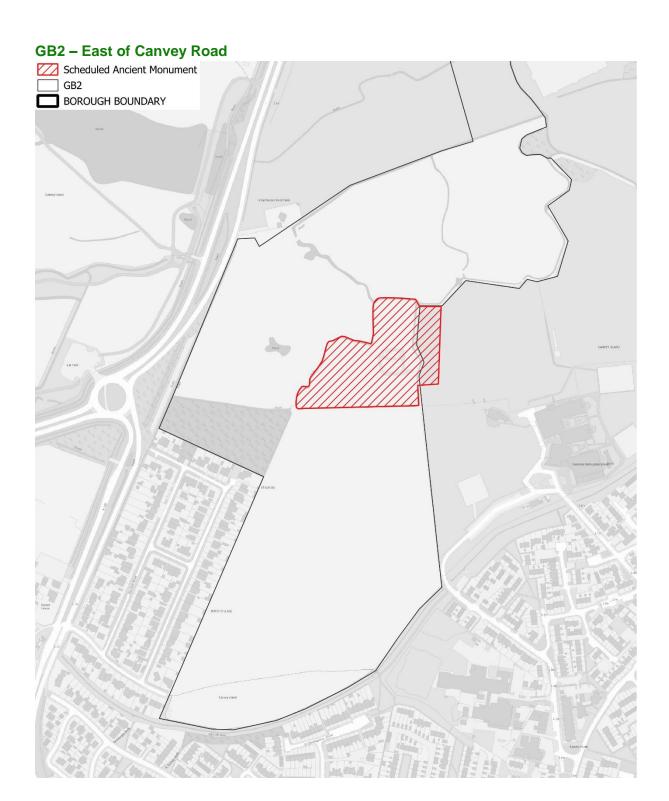
#### Heritage

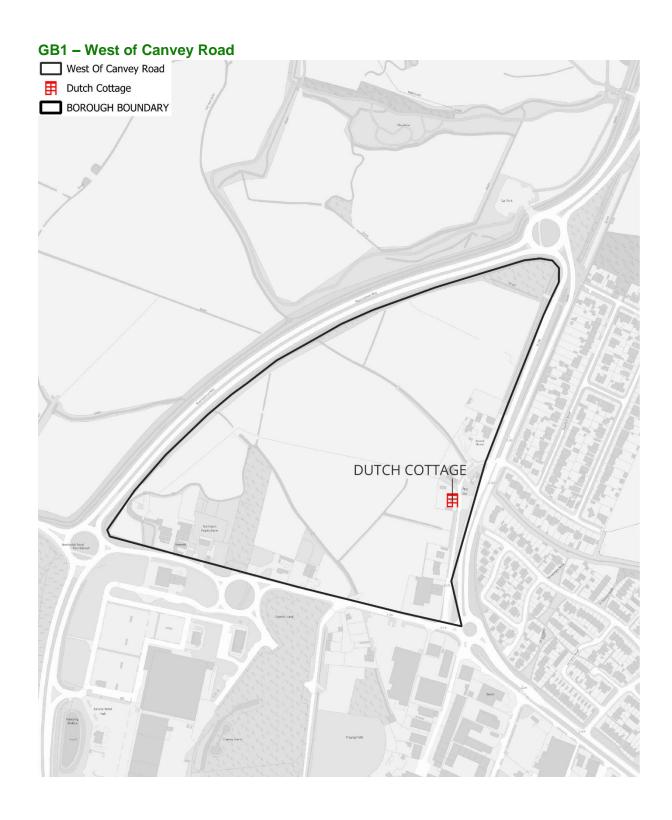
- 16.1 Heritage is a footnote 7 constraint, but is difficult to map at a Borough wide scale, and the impacts of development will vary from asset to asset. Previously, Heritage Impact Assessments have been prepared for heritage assets on Canvey and in Benfleet. Heritage Impact Assessments which were prepared for the withdrawn local plan and remain valid. They indicate a need for constraint around the Roman Saltern on Canvey (GB2 East of Canvey Road), and to the setting of the Dutch Cottage, also on Canvey (GB1 West of Canvey Road).
- 16.2 A Heritage Impact Assessment has recently been prepared for promoted site GB8 South of Hadleigh. This identifies the potential for development to impact on the significance of the Scheduled Monuments in this location, specifically the Roman Fort and Hadleigh Castle. Whilst this does not impact on the whole of the promoted site, it does indicate that it would be inappropriate to develop the field around the Roman Fort (parcel C), and to develop the land which provides the setting for the Castle (parcel F). This has implications for the capacity of this location to accommodate housing.

## **Heritage Maps**

## GB8 – South of Hadleigh





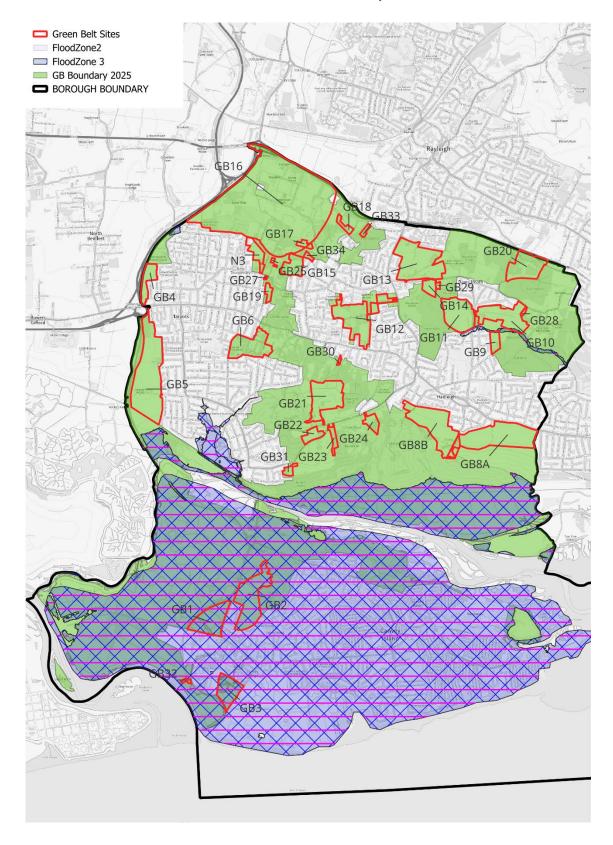


#### Flood Risk

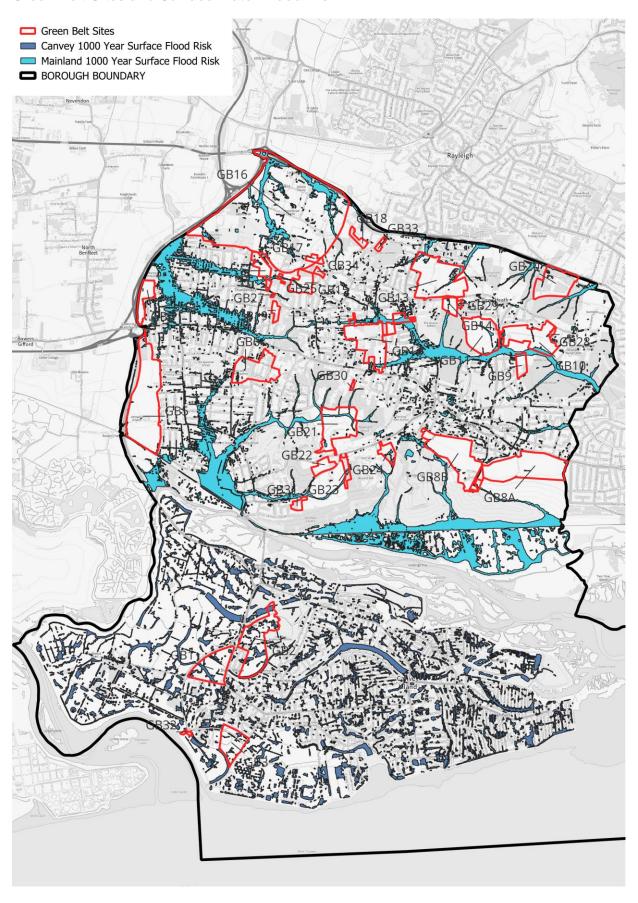
- 16.2 Flood risk is a footnote 7 constraint, however the application of the sequential and exceptions tests mean that it needs to be considered on a case by case basis. A Strategic Flood Risk Assessment (SFRA) has been prepared which updated the modelling of flood risk for Castle Point, both at the current time and looking and the future and the impacts of climate change. The SFRA is clear that a substantial area of the borough is at risk of flooding both now and in the future.
- 16.3 The risk of flooding in Castle Point comes from multiple sources. Canvey and parts of Benfleet are at risk of tidal flooding. However, substantial defences and the Thames Estuary 2100 Plan which seeks to maintain those defences, mean that the likelihood of flooding is significantly minimised and the risk is residual in nature. The impacts of such flooding would however be catastrophic and are increased with climate change.
- 16.4 The greater likelihood of flooding across the Borough comes from surface water flooding and the impact that rainfall events may have on the capacity of main rivers and ordinary watercourses. The risk of surface water flooding extends across the Borough, but is more significant on Canvey due to the low lying topography and in South Benfleet which is low lying below hills. There is also a significant risk around the Prittle Brook.
- 16.5 Mapping from the SFRA indicates that several of the Green Belt sites submitted to the Council for consideration for inclusion in the Castle Point Plan are in areas at risk of flooding either from tidal, fluvial or surface water (or a combination thereof).
- 16.6 Part 2 of the SFRA looks at specific sites. As part of this work, a spreadsheet was developed which identifies the flood risks at each of the original 16 Green Belt sites. This establishes their sequential preference based on all sources of flood risk, with greenfield sites on Canvey scoring poorly, and other sites affected by fluvial flood risk in Benfleet, Hadleigh and Thundersley.
- 16.7 As outlined in the Green and Blue Infrastructure Strategy, green spaces have a critical role to play in managing and mitigating flood risk. It is not therefore considered appropriate to develop Green Belt sites where there is a risk of flooding, as this not only puts future occupants at risk, but also increases flood risk to the existing urban areas nearby.

## **Flood Risk Maps**

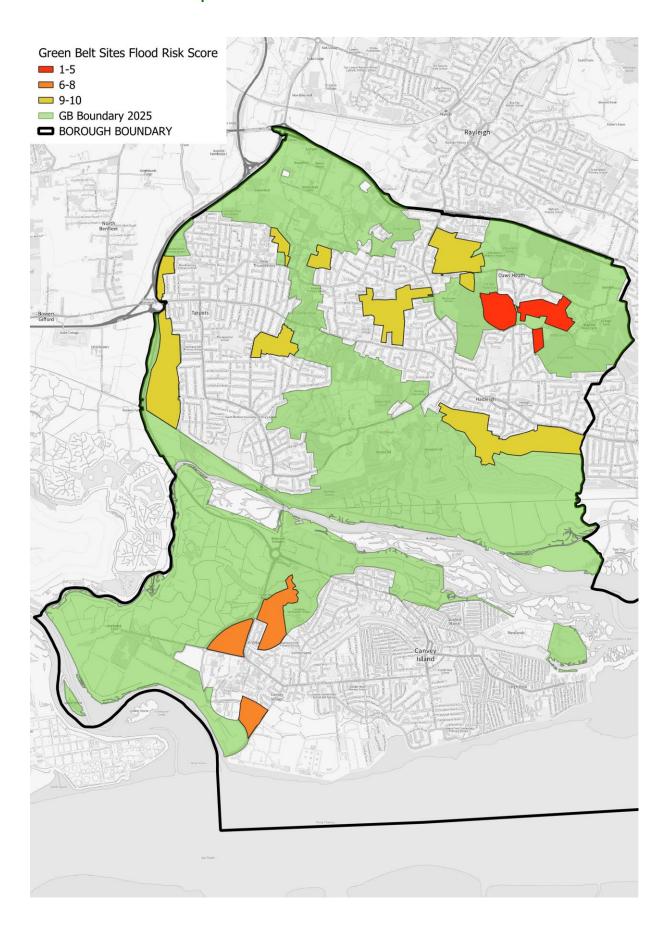
### **Green Belt Sites and Flood Risk Zones Tidal and Fluvial)**



#### **Green Belt Sites and Surface Water Flood Risk**



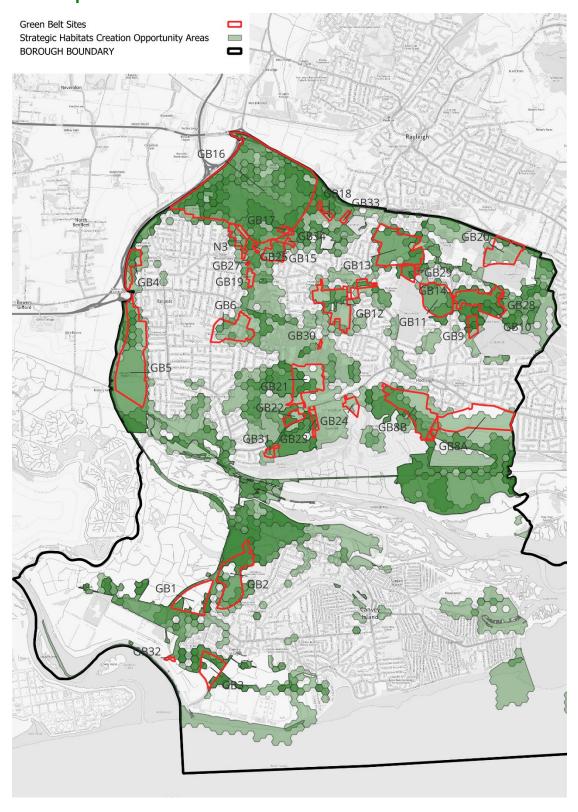
## **Green Belt Sites and Sequential Test Score**



### **Strategic Habitat Creation Opportunity Areas**

- 16.8 Earlier in this report the outcomes of the Local Nature Recovery Strategy (LNRS) are detailed. A key component of the LNRS is the identification of strategic habitat creation areas. These are areas where it has been identified as possible and appropriate to create new habitat thereby enhancing biodiversity and the robustness of the network of habitats across Essex. These strategic habitat creation opportunity areas have been identified following a mapping of all opportunity areas. The strategic habitat creation opportunity areas comprise the 15% best areas for creating habitats across the whole of Greater Essex.
- 16.9 Whilst in their current state, these areas are not a constraint on development, the loss of these areas to development would undermine the ability of the LNRS to effectively deliver the conservation and enhancement of biodiversity across Greater Essex. The NERC Act requires Council's to take the LNRS into account as part of their duty to conserve and enhance biodiversity. The map that follows shows the extent to which the strategic habitat creation opportunity areas overlap with the Green Belt site submitted for consideration.

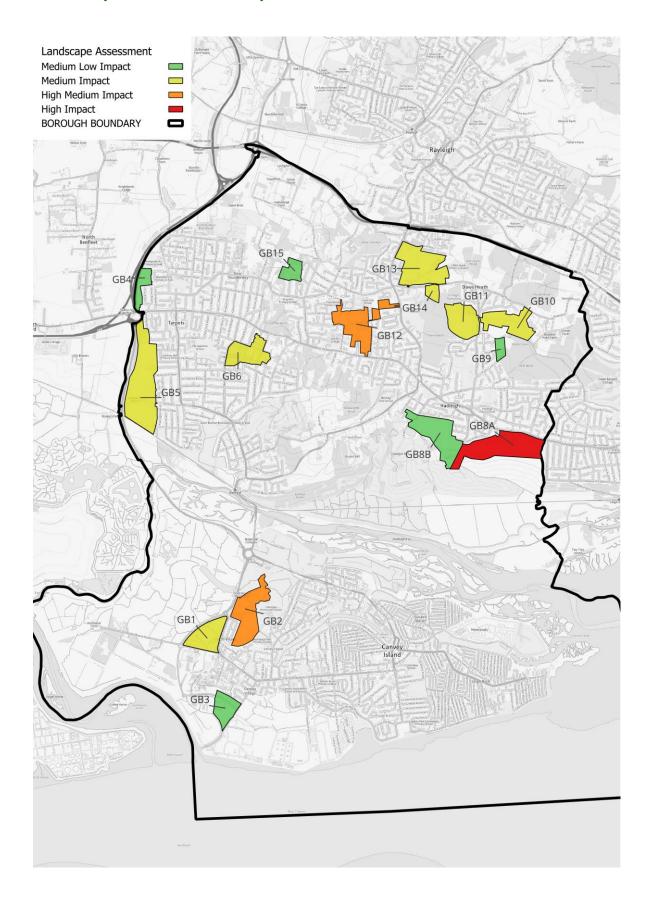
# **Strategic Habitats Creation Opportunity Areas and Submitted Green Belt Sites Map**



### Landscape

- 16.8 Landscape impact is not a matter addressed through footnote 7 in respect of Castle Point. However, a Landscape Sensitivity Assessment has been completed for those sites included in the Issues and Options Document.
- 16.9 Similarly to Green Belt Review, the Landscape Sensitivity Assessment has concluded that North West Thundersley (GB16) demonstrates a complex array of constraints, intrinsic characteristics and features and that further work should be undertaken to comprehensively evaluate the landscape sensitives and impacts for this area.
- 16.10 The Landscape Sensitivity Assessment indicates that some sites are more sensitive to development than others. Whilst this constraint alone does not provide a strong reason for resisting development, when overlaid with other constraints, this may impact on decision making. The role of the landscape in the sense of place was highlighted through the Green and Blue Infrastructure Strategy.

## **Landscape Assessment Map**



#### 17 Other Considerations

#### Infrastructure

17.1 Infrastructure capacity has been considered through the Infrastructure Delivery Plan (IDP). At this stage it has primarily focused on the needs of the urban area growth, however scenarios have been tested for higher levels of growth of circa 7,000 – 8,000 homes. Generally, it is considered that needs arising from growth of this order can be met. However, the distribution of sites may impact on the need for the provision of a primary school in the Benfleet, Hadleigh, Thundersley area, which has a larger land requirement than some other infrastructure types. If this need cannot be met it may be a constraint on the delivery of sites in part of the Borough.

### Regeneration

- 17.2 Regeneration is beneficial for Castle Point as it brings economic, social and environmental improvements that enhance the overall quality of life for residents. Revitalizing existing areas brings a plethora of benefits not limited to; boosting the local economy, better job opportunities, improved public safety and ultimately helps to create inclusive, thriving communities.
- 17.3 There is a compelling policy argument that restricting development on Green Belt land plays a critical role in encouraging regeneration within existing urban areas.
- 17.4 By limiting development on protected land, it helps focus investment towards brownfield sites and underutilised urban land. This supports sustainable growth, reduces urban sprawl, and preserves the borough's distinct natural and rural character.
- 17.5 This approach aligns with national planning policy, which gives substantial weight to the reuse of previously developed land and supports the revitalisation of town centres and established communities.
- 17.6 Paragraph 124 of the NPPF encourages development to make effective use of land and to make as much use of previously developed or brownfield land as possible which are key to urban regeneration. Paragraph 125 goes onto to emphasise that planning policies should support development of underutilised land and buildings, support opportunities to use airspace above existing residential and commercial premises for new homes.
- 17.7 When considering the release of Green Belt, the impact that it would have on regeneration is a key consideration for the Council.
- 17.8 Chapter 13 of the NPPF details that the government attaches great importance to Green Belts and acknowledges the essential characteristics of Green Belts are their openness and their permanence.
- 17.9 Specifically at paragraph 143, the NPPF sets out the five purposes of the Green Belt:
  - a) To check the unrestricted sprawl of large built-up areas;
  - b) To prevent neighbouring towns merging into one another;
  - c) To assist in safeguarding the countryside from encroachment;

- d) To preserve the setting and special character of historic towns; and
- e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 17.10The fifth purpose places an emphasis on promoting sustainable development and reducing the need to encroach on greenfield sites by prioritising the redevelopment of previously developed land.
- 17.11 Allowing development of green field land can deter regeneration by providing a lower cost, less complex alternative to brownfield development which although attractive to developers, reduces the requirement for developers to contribute to infrastructure improvements, public realm enhancements or community facilities.
- 17.12 Castle Point, with its tightly bounded settlements and environmental constraints, faces a unique challenge in meeting housing needs while protecting its strategic Green Belt. Prioritising regeneration within town centres and existing built-up areas can deliver new homes, improve infrastructure, and support the Council's long-term objectives for sustainable place-making, climate resilience, and economic revitalisation.
- 17.13The Sustainability Appraisal (SA) details the economic and employment baseline for Castle Point. In summary these are:
  - Economic activity within the Borough is lower than regional and national averages
  - A decline in manufacturing/industrial employment to 2036 is forecast in the Borough, only partly compensated by an increase in office jobs.
  - Residents receive less than average gross pay.
- 17.14This evidences the Boroughs need for regeneration in order to boost the local economy of the area.
- 17.15 The Housing Topic Paper (July 2025) and Employment Topic Paper (July 2025) details the supply-led regeneration strategy taken by the Castle Point Plan to consolidate and modernise the existing employment land portfolio through:
  - Safeguarding and intensifying existing employment areas
  - Supporting town centre employment and mixed-use development
  - Utilising permitted supply at West Canvey
- 17.16 This approach will likely support hundreds of additional net jobs, raise average productivity and generate high annual GVA gains. Other benefits expected include; land value uplift that will help to fund infrastructure, higher job densities in modern premises, skills and wage improvements

### **Viability**

- 17.17Regeneration plays a critical role in promoting sustainable, inclusive growth, but it presents complex viability challenges that require a coordinated policy response.
- 17.18 For Castle Point, where much of the remaining development potential lies in urban and brownfield sites, understanding and managing the impact of regeneration on development viability is essential to achieving housing and economic objectives.
- 17.19There is a concern that encouraging development which brings regeneration can cause sites to be less viable and less attractive to developers. This is due to higher costs associated with demolition, remediation and upgrading existing infrastructure.
- 17.20 However, through strategic plan making the Council can mitigate some of these concerns.
- 17.21 By including council owned land as sites to be regenerated the amount of profit required on a scheme can be reduced. By utilising this at the start of the plan period, the impact of early regeneration will deliver long term value creation through increased property values, improved investor confidence, job creation and enhanced local services.
- 17.22Over time, this will lead to an economic uplift that will benefit both public and private sectors.
- 17.23Furthermore, the Castle Point Plan has been thoroughly assessed for viability impacts to ensure that the plan is deliverable. This is set out in the Castle Point Viability Study Report July 2025.
- 17.24There are also some concerns regarding the viability and deliverability of Green Belt sites should the Castle Point Plan allocate enough housing to meet the standard method figure of 686 homes per annum.

### **Market Capacity**

- 17.25 Given the small size of the Castle Point Borough the concern is that the housing market will not be able to absorb this amount of housing deliverability, this is discussed further in the next section. Housing market capacity refers to a local market's ability to absorb new residential development while balancing demand, infrastructure, environmental sustainability, and quality of life. This includes factors like land availability, planning policy constraints, transport and utilities infrastructure, local services (e.g., schools, healthcare), environmental conditions, and market demand for housing. Effective capacity planning is essential to ensure that communities have access to the right type and affordability of housing to meet local needs.
- 17.26The changes to the housing targets implemented through the revised NPPF published in December 2024 reflect the government's intention to significantly increase the delivery of housing across the UK. For Castle Point this translates to 11,662 homes to be delivered over a 17-year period, which equates to 686 homes delivered per annum. The annual

housing requirement would require a 700% increase in housing delivery per annum compared to current levels.

- 17.27It is not clear that there is capacity in the market to absorb this level of delivery. Castle Point faces significant challenges in delivering the required volume of new homes as the revised target is not thought to be aligned with the local market demand, potentially leading to oversaturation and a mismatch in delivery. Key barriers to achieving this quantity of homes in Castle Point is the size of the borough, which at only 17sq miles in total is unlikely to be able to accommodate the approximately 14 construction outlets necessary at any one time to deliver 686 homes per annum. In additional to this there are concerns about the availability of skilled construction labour, access to materials, financial investment from developers and broader economic conditions.
- 17.28The housing market has a significant impact on delivery. Since 1998 the ratio of average house prices to average earnings have more than doubled. Over the last 8 years, house prices in Castle Point have increased by as much as £60,000. While government policy has been an important driver of the availability of adequate housing, the economic environment, demographics and other factors have had a large influence on market outcomes. This can be directly linked to inflation, higher mortgage costs, Brexit and stagnant incomes.
- 17.29It has been identified that new housebuilding has fallen short of housing targets across the country. The findings of the Letwin Review concluded that the build-out rate of housing developments is primarily constrained not by planning policy or technical issues, but by market absorption rates the speed at which homes can be sold at current prices. The chief executive of Taylor Wimpy has stated that planners should not be blamed as housebuilders are controlling their supply to maintain price in a difficult market. From a business perspective housebuilders do not want to build homes they cannot sell or can only sell at a reduced price which leads to the conversion rates of planning permissions to delivery being significantly impacted.
- 17.30 Nationally, studies have been undertaken with commentary on both conversions rates and also the average timescales for planning permission to completion of units. Lichfield's Start to Finish<sup>4</sup> provides a useful insight on timescales of the development cycle. The key information from this research is summarised below:
  - Only sites of 99 dwellings or fewer can be expected to deliver anything in a five year period from validation of a planning application, with delivery of the first dwelling taking on average 3.8 years.
  - Tough market conditions have caused build out rates to slow.
  - Demand is a key driver of build-out rates, the rate at which homes can be sold (the absorption rate) at a market value consistent with the price paid for the land determines the build-out rate.
  - Schemes with 30% or more affordable housing had faster annual build out rates than schemes with a lower percentage.

<sup>4</sup> https://lichfields.uk/content/insights/start-to-finish-3

- On average it takes around 3-4.6 years from obtaining outline permission to deliver the first dwelling.
- 17.31 In this context, large sites in Castle Point are likely to experience slower delivery unless there is greater diversity in housing types, tenures, and developers to increase market absorption. Where developers face capacity issues such as labour shortages, material delays, or concerns over demand they may stagger construction or phase developments cautiously, reducing the annual housing output and impacting the Council's ability to demonstrate a five-year housing land supply.
- 17.32Consequently, there is a risk to Castle Point there may be an overallocation of land for development when considered against market absorption rates. This would have three consequences for local people:
  - 1. It would create uncertainty for local communities and a mistrust in the planning system, as they will lose green space, but not necessarily see the homes or the infrastructure associated with it for many years, if at all.
  - 2. It would result in land that could be used effectively for green infrastructure purposes designated for residential purposes, only for it to sit idle and deliver neither.
  - 3. It would frustrate the regeneration of urban areas, as sites which are in greatest need of re-use are not brought to the market in favour of sites which are easier to develop.
- 17.33It is therefore important that market absorption rates are considered when determining the housing capacity of an area. Failure to do so would result in an ineffective plan that fails to deliver critical elements of the Castle Point Plan that align with the NPPF such as nature conservation and enhancement, regeneration and sustainable travel patterns.
- 17.34Work is underway to determine more precisely the absorption rate for the Borough, however, demographic data and affordability data explored through the Local Housing Needs Assessment 2023 indicate that rates are more likely to be of the order of 255 to around 350 homes per annum. The Local Housing Needs Assessment Update 2025 indicates that across the UK the standard methodology will deliver at least 84,000 homes per annum over and above that needed to accommodate household growth and migration (high scenario). Therefore, it is likely that across the country, housing absorption rates will be below the housing target emerging from the standard method. This is therefore likely to be an issue not just for Castle Point, but for other areas also.
- 17.35It should be noted that the level of delivery proposed in the Castle Point Plan Regulation 19 Draft would, whilst stepped, significantly boost the supply of housing as required by the NPPF. Initially supply would double, and on average there would be a 350% increase in supply over the plan period.

#### 18. Conclusion

This Housing Capacity Topic Paper summarises how the Council have undertaken a comprehensive and evidence-led assessment of Castle Point Borough's ability to accommodate housing growth in line with the Government's standard method requirement of 686 homes per annum (11,662 homes during the plan period).

The NPPF is clear in paragraph 3 that it is to be read as a whole. Policies are interdependent and a holistic understanding ensures balanced decision making.

Despite extensive work to maximise urban capacity, including detailed site assessments, density modelling, and regeneration strategies, the Borough can only sustainably deliver 6,196 homes over the plan period.

The Green Belt, which comprises approximately 53% of the Borough, is heavily constrained. Approximately 22.8% is affected by NPPF footnote 7 constraints, and further areas are restricted due to biodiversity designations under the NERC Act, flood risk, open space deficits, and heritage considerations.

Even within potentially unconstrained areas, sustainable accessibility and infrastructure deliverability present significant barriers to development.

The Green Belt Review and site-specific assessments confirm that only a limited number of sites may be suitable for further consideration, and even these face challenges in terms of connectivity and landscape and environmental impact. The transport evidence demonstrates that additional growth beyond the allocations within the urban area would exacerbate congestion and undermine sustainable travel objectives.

Furthermore, market capacity analysis indicates that the local housing market cannot absorb the scale of growth required by the standard method. Delivery at this level would risk oversaturation, delay regeneration, and compromise the effectiveness of the Castle Point Plan.

In conclusion, while the Council remains committed to boosting housing supply and meeting local needs, it is not reasonably possible to accommodate the full standard method requirement within the Borough. A locally justified housing requirement, grounded in robust evidence and aligned with national policy, offers a more sustainable and deliverable approach. This strategy prioritises urban regeneration, protects valued landscapes and biodiversity, and supports the long-term wellbeing of Castle Point's communities.