



**Castle Point Borough Council**

**Pre-Submission Local Plan**

**Duty to Cooperate Compliance Statement**

**January 2026**

## 1. Introduction

- 1.1. This Duty to Cooperate (DTC) compliance statement outlines the long established and ongoing cooperation which exists between Castle Point Borough Council and its neighbouring authorities across the South Essex area, the wider Essex region and with other prescribed public bodies.
- 1.2. The authorities of South Essex comprise of the two unitary authority areas of Southend-on-Sea and Thurrock, and the four Essex County districts/boroughs of Basildon, Brentwood, Castle Point and Rochford. The wider Essex region includes Braintree, Chelmsford, Colchester, Epping Forest, Harlow, Maldon, Tendring, and Uttlesford.
- 1.3. Co-operation across the region and relevant organisations has been in place for many years and has resulted in close working relationships at officer and member level on strategic planning matters. The preparation of the Castle Point Plan has been underpinned by these close working relationships. There has also been ongoing engagement under the Duty to Cooperate with various statutory stakeholders including Natural England, Historic England, the Environment Agency, Sports England, Essex Police, NHS, as well as stakeholders managed by Essex Council.
- 1.4. Essex County Council is responsible for the following services for Castle Point Borough:
  - Minerals and Waste Planning Authority
  - Highway and Transportation Authority
  - Lead authority for education (including early years and childcare)
  - Lead Local Flood Authority
  - Providing and delivering supported and specialist housing (including Adult Social Care) and public health services
  - Lead on climate change and net zero carbon and green and blue infrastructure
  - Responsible Authority for the Greater Essex Local Nature Recovery Strategy.
  - Community and Cultural Services
  - Major Infrastructure Plans

## 2. Purpose of the Statement

- 2.1. This report describes the on-going collaboration between Castle Point, its neighbouring authorities and statutory stakeholders on the development proposals brought forward in the Castle Point Plan. It has been prepared in accordance with the "Duty to Cooperate" introduced by Section 33A of the Planning and Compulsory Purchase Act 2004 to demonstrate the constructive and ongoing engagement between all stakeholders.

- 2.2. The Local Planning authorities of South Essex are at different stages in their Local Plan making and agreements have been reached as far as possible taking this into account. This report demonstrates close co-operation and a clear intention to participate in an effective and ongoing manner on the key issues.
- 2.3. Successful joint working across Essex and in particular South Essex will ensure that the individual plans of the local planning authorities are effective delivering the best results for businesses and residents. It will also assist public bodies in securing the necessary infrastructure provision to support growth in the area.
- 2.4. The government intends to abolish Duty to Cooperate, however, this would not come into force until the end of December 2026, in which case for the purpose of the Castle Point Plan, Duty to Cooperate remains a statutory requirement. As such, the Duty to Cooperate will form one of the legal tests to be considered by the Inspector at the Local Plan Examination, while compliance with the NPPF's requirements for positive preparation and effectiveness form part of the soundness test. This report provides evidence to demonstrate that Castle Point Borough Council has met the legal and soundness requirements relating to cooperation in preparing the Castle Point Plan.
- 2.5. The report explains the context for the Plan and outlines the stages undertaken in its preparation, the mechanisms for collaboration before identifying the strategic issues and describing the cooperation undertaken with the different organisations, bodies and relevant parties.

### **3. Policy & Guidance Context**

- 3.1. The Localism Act came into effect in November 2011 and sets out the requirements that local authorities must fulfil in relation to the Duty to Cooperate. Section 110 of the Localism Act 2011 inserts the Duty to Co-operate in relation to sustainable development as a new section 33A of the Planning and Compulsory Purchase Act 2004. Under this Act, the Town and Country Planning Regulations 2012 identify the prescribed bodies (listed below) that local authorities are required to engage with actively and on an ongoing basis to maximise the effectiveness of local and marine plan preparation relating to strategic cross boundary matters.
  - Adjoining Local Authorities
  - Environment Agency
  - Historic England
  - Natural England
  - Mayor of London
  - Civil Aviation Authority
  - Homes England
  - Office of the Rail Regulator
  - Transport for London

- NHS Clinical Commissioning Group (now NHS Integrated Care Board)
- NHS England
- The Marine Management Organisation

3.2. Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended) places a duty on Castle Point Borough Council, in preparing its Local Plan, to “engage constructively, actively and on an ongoing basis” with other relevant organisations to maximise the effectiveness with which the Plan preparation is undertaken.

3.3. The National Planning Policy Framework (NPPF) 2024 in paragraphs 24-28 provides more specific advice on the approach to be taken in achieving effective cooperation between local planning authorities, the relevant County Council and other prescribed bodies. The procedural planning Inspectorate Practice in the Examination of Local Plans sets out guidelines on how the Duty to Cooperate will be assessed during public examination. It establishes that the Inspector will assess whether the LPA has met the Duty to Cooperate by reviewing the authority’s statements of compliance with the Duty to Cooperate.

3.4. The statement of compliance should be submitted identifying the relevant strategic matters and the key issues that need to be addressed, and then show how these have been resolved, or provide reasons if resolution has not been reached. It should detail who the local authority has co-operated with and on which strategic Matter (s), the nature and timing of the co-operation (e.g. by including meeting notes), and the outcomes of the co-operation, including how it has influenced the plan.

3.5. The NPPF paragraph 28 also advises that the LPA should prepare one or more statements of common ground with relevant bodies.

3.6. The Inspector will need to be satisfied that the LPA has met the duty to co-operate by engaging with neighbouring authorities and other bodies constructively, actively and on an ongoing basis, in order to maximise the effectiveness of the plan preparation process.

## 4. Castle Point Context and Local Plan Background

- 4.1. Castle Point is a small borough in the County of Essex in the subregion of South Essex, it covers 17.4 square miles with a population of over 89,000 people. The borough is bordered by Southend-on-Sea to the East, Rochford District to the North, Thurrock Unitary to the Southwest, Basildon Borough to the West and the Thames Estuary to the South. Within Castle Point there are five settlements: Benfleet, Thundersley, Hadleigh, Daws Heath and Canvey Island.
- 4.2. South Essex's proximity to London and its position on the Thames Estuary have been the major factors behind the historical growth of South Essex and these will continue to be main influences on its future growth and wider relationship with the rest of Essex. London Southend airport, the Port of Tilbury and DP World London Gateway in Thurrock and the future Lower Thames Crossing which will link Essex via Thurrock to Kent will provide further economic opportunities in the area.
- 4.3. Castle Point is well connected by the A13, A127 and A130 which links to wider Essex and London, it also has a direct train route to London via South Benfleet Station.
- 4.4. The borough is within London's Metropolitan Green Belt with 53% designated as Green Belt. Most of the borough is below sea level with nearly 50% falling within flood zone 3. It has six sites of special scientific interest, seven scheduled monuments and a number of local wildlife sites, ancient woodlands and geological sites.
- 4.5. Castle Point prepared a local plan 2018-2033 which was found sound by the inspector in 2019. However, the results of election in May 2022 demonstrated that the local plan did not have local support, and the Council decided not to adopt the plan. Following its withdrawal in June 2022, the Council approved the preparation of a new local plan for the Borough- the 'Castle Point Plan' on 30<sup>th</sup> November 2022.
- 4.6. The Castle Point Plan did not start from a blank page. The Inspector in assessing the Duty to Cooperate in relation to the withdrawn 2019 Castle Point Local Plan was satisfied that the Council had met its duty and had engaged constructively, actively and on an on-going basis in the preparation of that plan with neighbouring authorities and key stakeholders. Furthermore, much of the joint working and evidence base which contributed to the 2019 Local Plan provided a good base for continued collaboration and upon which to update evidence to support The Castle Point Plan.

## **Regulation 18 Issues and Options**

- 4.7. In July 2024, Castle Point Borough Council approved the commencement of a formal Regulation 18 public consultation on the Issues and Options Consultation Document and associated supporting materials. The consultation ran from 22 July to 16 September 2024. The consultation was informed by a borough-wide Call for Sites exercise, an updated urban capacity review, and early engagement with statutory consultees and community stakeholders to ensure inclusive participation. Feedback received during this stage helped shape the spatial strategy, housing options, and infrastructure priorities for the emerging Castle Point Plan.
- 4.8. All responses received during Regulation 18 Issues and Options are available to see [Castle Point Borough Council - Citizen Space](#). A detailed [issues-and-options-consultation-statement-july-2025-pdf](#) has also been published, which summarises the representations received, sets out the Council's response to the key issues raised, and explains how the feedback has shaped the Regulation 19 Publication Plan and Policy formulation.
- 4.9. The revised NPPF was published in December 2024, resulting in a new timetable for the preparation of the Castle Point Plan as set out in the [local-development-scheme-january-2025pdf.pdf](#) this was approved by Council on 29 January 2025. It also provided a new standard methodology for calculating housing need and changes to Green Belt policies, which required consideration through the local plan making process.

## **Regulation 19: Publication and Submission Consultation**

- 4.10. On 23<sup>rd</sup> July 2025, the Council approved the Regulation 19 Draft Castle Point Plan, alongside the Sustainability Appraisal, Habitats Regulations Assessment, Equality Impact Assessment, Statement of Consultation, and all supporting evidence for formal public consultation. The Regulation 19 consultation commenced on 1<sup>st</sup> August 2025 and closed on 26<sup>th</sup> September 2025. This stage invited representations on the legal compliance and soundness of the Plan, as defined by the National Planning Policy Framework (2024). The Plan reflected updated evidence and strategic cooperation outcomes detailed in this report. It set out the proposed development strategy for the Borough to 2043, including housing allocations, infrastructure delivery, and environmental protection policies
- 4.11. Due to a technical error an earlier version of the Local Plan appeared on the Council website for a short period during the August to September Regulation 19 Consultation. Consequently, a further Regulation 19 Public Consultation was undertaken from 24th October 2025 to 5th December 2025 to ensure that everyone had the opportunity to make representations to the correct version of the plan.

- 4.12. All responses received during the Regulation 19 Consultations are available to view on the Examination website. A detailed consultation statement has also been published, this summarises the representations received and sets out the Council's response to the key issue raised and any modifications made to the Local Plan.
- 4.13. The local development scheme has been amended to accommodate the additional unscheduled Regulation 19 Consultation and the new requirement to complete and submit a check list to the Planning Inspectorate for approval to proceed to examination.

## 5. Strategic Governance and Cooperation Mechanisms

- 5.1. Castle Point Borough Council has participated actively in a range of strategic governance structures that support cross-boundary cooperation across South Essex and Greater Essex. These mechanisms have provided the framework for ongoing engagement, evidence sharing, and joint working on strategic planning matters. These include: South Essex Councils and Joint Officer Group, Essex Planning Officers Association, Essex Developers Group and the Riverside Strategy Group. The Council has also had regular one to one meetings with neighbouring authorities, statutory bodies and Essex County Council throughout the preparation of the Plan which continues on an ongoing basis.
- 5.2 More information is provided in the Appendices.

## 6. South Essex Councils (SEC) and Joint Committee

- 6.1. The councils of Basildon, Brentwood, Castle Point, Rochford, Southend on Sea, Thurrock and Essex County Council formed a strategic partnership in 2017 to develop a long-term growth ambition which would underpin strategic spatial, infrastructure and economic priorities in South Essex. The collaboration was underpinned by a Memorandum of Understanding (MoU) signed in January 2018<sup>1</sup> creating the Association of South Essex Local Authorities (ASELA). In 2023 the leaders and Chief Executives agreed to refresh the identity for the partnership which is now known as South Essex Councils (SEC). The SEC's core purpose is to provide leadership for South Essex and to deliver a vision for the region up to 2050<sup>2</sup> so as to promote healthy growth for South Essex Communities. This is achieved through collaboration, by sharing resources, joint evidence and by lobbying government.
- 6.2. South Essex 2050 Ambition was initiated by the Association of South Essex Local Authorities (ASELA) in 2018 and furthered by South Essex Councils (SEC) and aims to build on South Essex's economic opportunities. Its objectives are to prioritise growth that provides good digital infrastructure, improved transport

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<sup>1</sup> [South-Essex-Joint-Strategic-Plan-Statement-of-Common-Ground-June-2018](#)

<sup>2</sup> <https://www.southessex.org.uk/opportunity-south-essex>

connectivity, enhanced green and blue infrastructure opportunities, greater commercial development and employment skills and good quality housing in the right places. This ambition has been followed through in the Castle Point Plan, which envisages a borough where residents have good quality and affordable homes in thriving communities with access to green spaces, economic opportunities, and amenities enabling them to fulfil their potential and live happy, healthy lives.

- 6.3. The SEC enables South Essex to discuss cross-boundary issues including Housing, the Local Economy, Employment and Skills, Digital Connectivity, the Environment, Transport and Infrastructure. The members group meets on a quarterly basis and is supported by the South Essex Joint Officers Group. (JOG).
- 6.4. Castle Point Borough Council is an active member of SEC and has contributed to its strategic direction, including the South Essex 2050 Vision, the South Essex Framework, and the South Essex Economic Growth Action Plan.

## 7. South Essex Joint Officer Group (JOG)

- 7.1. The South Essex Joint Officer Group (JOG) operates under the SEC governance structure and plays a key role in coordinating strategic planning and infrastructure delivery. It comprises planning officers from the six South Essex authorities, the Essex Housing Group and Essex Council.
- 7.2. It provides technical expertise and ensures strategic alignment to support the implementation of decisions made at the political level. The JOG works under the SEC Members Steering Group. It also supports a Project Delivery Board, composed of senior officers from the partner authorities. Meetings take place monthly and consider matters of a cross-boundary nature, as well as providing an opportunity to discuss relevant planning matters, including updates on local plan progress.
- 7.3. The JOG assists in the coordination of cross-boundary planning matters, particularly in relation to housing, economic growth, and infrastructure. Task groups are formed as needed to work on specific planning topics. JOG therefore provides an important forum for fulfilling the Council's Duty to Cooperate obligations, as well as commissioning joint evidence studies where necessary. Further details on JOG meetings during the preparation of the Castle Point Plan are set out in Appendix 1
- 7.4. The SEC and JOG have worked together on the following issues and evidence base
  - South Essex Growth and Recovery Prospectus July 2020<sup>3</sup>
  - South Essex Advanced Technical Skills- Provision of advanced technical courses to Degree, apprenticeships or CPD September 2023
  - SEC Digital Programme to secure delivery of SEC IOT LoRaWAN

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<sup>3</sup> Association of South Essex Local Authorities - Growth and Recovery Prospectus, July 2020

- South Essex Joint Strategic Framework- to coordinate strategic infrastructure to support development across South Essex
- South Essex Active Travel Network- Programme to shift movement to active modes
- Green Blue Integrated Public Transport and Living Stations-Provision of rapid transport network linked to Transport Hubs cross South Essex
- Strategic Interchange of Hubs on the Thames at Tilbury and Southend to support passenger river services
- EV infrastructure network- ensuring EV charging in place across South Essex
- The South Essex Estuary Park SEEPARK- 5 connected large landscapes across South Essex
- South Essex 2050

7.5. The work of the SEC has fed into the Castle Point Plan through the vision and objectives which has drawn on South Essex 2050 vision, its policies around supporting and enhancing green spaces, developing local skills, active travel improvements and communications infrastructure.

7.6. Details of the meetings and minutes can be found in the appendices.

## **8. Opportunity South Essex**

8.1. Opportunity South Essex (OSE) is a private sector led partnership with members from South Essex businesses, local authorities and further and higher education. It works with the South Essex Councils to provide a strong business voice to the work of South Essex Council. It meets quarterly and Castle Point Borough Council is an active member of OSE and contributes to its strategic direction. The OSE plays a key role in articulating the sub-region's economic priorities.

## **9. Essex Planning Officers Association (EPOA)**

9.1. Castle Point officers also participate in the Essex Planning Officers Association (EPOA), a county-wide body that facilitates strategic coordination across Greater Essex. EPOA comprises of a main board of chief planning officers from 12 local planning authorities and 2 unitary authorities (Thurrock and Southend-on-Sea) and a policy forum (chaired by Castle Point's Planning Policy Team Leader), a Development Management Forum, a Planning Support and Admin Forum and a Design Forum.

9.2. EPOA provides a forum for discussing planning related matters affecting Greater Essex, enabling the sharing of good practice and facilitating cooperation and joint working on issues of a strategic nature and common interest. It also commissions joint evidence and delegates workstreams to forums and sub

working groups as well as lobbying for and representing Essex on behalf of the partner local authorities.

- 9.3. EPOA has commissioned joint evidence and Guidance:
  - Essex Parking Guidance 2024<sup>4</sup>
  - Essex Design Guide<sup>5</sup>
  - Essex Recreational Disturbance Avoidance and Mitigation Strategy (RAMS)<sup>6</sup>
  - Mechanism for Consideration Unmet Gypsy and Traveller Need<sup>7</sup>
  - Mechanism for Consideration of Unmet Housing Need<sup>8</sup>
  - Greater Essex Viability Protocol<sup>9</sup>
  - Gypsy and Traveller Accommodation Assessment
  - Gypsy and Traveller Transit Pitch Study<sup>10</sup>
- 9.4. Much of this evidence has informed the Castle Point Plan from its parking policies and design polices to utilising the mechanism for unmet need. Castle Point helped prepare the Essex Recreation Avoidance and Mitigation Strategy with its neighbouring authorities and has since implemented the tariff to all new development.
- 9.5. Details of meetings and minutes can be found in the appendices.

## 10. Essex Developers Group

- 10.1. Castle Point also hosts the Essex Developers Group and participates in the Essex Housing Group, supporting engagement with developers and registered providers.
- 10.2. The Essex Developers group comprises of developers, contractors, consultants, local housing companies, housing associations, Essex County Council and borough, city, district and unitary authorities as members. The group aims to eliminate barriers to house building and maximise commercial opportunities by getting the public and private sectors working together in a sustainable way that meets local needs. The group meets bimonthly and are supported by the South Essex Housing Group (SEHG) and the Essex Housing Officers Group (EHOG).

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<sup>4</sup> [essex-parking-guidance-2024-part-1-design-and-good-practice](#)

<sup>5</sup> [Essex Design Guide](#)

<sup>6</sup> [DUT007\\_Essex\\_Coast\\_Recreation\\_Avoidance\\_and\\_Mitigation\\_Strategy\\_MoU.pdf](#)

<sup>7</sup> [Mechanism-for-the-consideration-of-Unmet-Gypsy-and-Traveller-Need-2018](#)

<sup>8</sup> [Mechanism-for-the-Consideration-of-Unmet-Housing-Need-2017\\_Agreed Sept 2017](#)

<sup>9</sup> [Essex-Local-EPOA\\_Viability\\_Protocol\\_June\\_2018](#)

<sup>10</sup> [Memorandum-of-Understanding-MoU-Gypsy-and-Travellers-Transit-Pitch-Provision-Evidence-Base-Study-2020](#)

10.3. Engagement with developers and their input into the Local Plan through the Developers Group and through the representations to consultants has informed the Castle Point Plan in its policies around developer contributions and design and mix of housing. In so doing providing a plan which delivers sustainable but also deliverable growth within the borough. Details of these meetings can be found in the Appendix.

## 11. Addressing Key Strategic Cross Boundary Matters

11.1. For the Duty to Cooperate to work effectively, local authorities should collaborate from the outset. However, neighbouring authorities are at very different stages of local plan preparation which affects the extent to which joint working can take place.

11.2. The Duty to Cooperate affects Castle Point in the following ways in terms of cross boundary strategic issues:

- Working with neighbouring local authorities;
- Working with Essex County Council;
- Working with the prescribed bodies such as, Natural England, and the Environment Agency;
- Working with infrastructure providers such as Anglian Water

11.3. The Council has actively engaged with neighbouring local authorities, statutory bodies, infrastructure and service providers and other key stakeholders on an ongoing basis on wider strategic and cross-boundary issues relevant to the Local Plan. This includes regular meetings to discuss mutual strategic issues and Statements of Common Ground with key partners confirming alignment on strategic matters and evidencing compliance with the Duty to Cooperate.

11.4. Castle Point Borough Council has engaged constructively, actively, and on an ongoing basis with neighbouring authorities and prescribed bodies throughout the plan-making process. This includes regular meetings to discuss mutual strategic issues and Statements of Common Ground with key partners confirming alignment on strategic matters and evidencing compliance with the Duty to Cooperate.

- Regular Duty to Cooperate meetings with Basildon, Rochford, Southend-on-Sea, Thurrock, Brentwood and Chelmsford Councils as well as Essex County Council (see appendices)
- Participation in the South Essex Joint Officer Group and South Essex Councils (SEC) strategic forums.
- Participation in Essex Planning Officers Association meetings and associated working groups.
- Collaboration on shared evidence with other Councils, including the Essex Coastal Recreational Avoidance and Mitigation Strategy, Gypsy and Traveller Transit Site Study as well as around Green Belt methodology.

## **12. Strategic Issues**

- 12.1. The relevant key strategic matters applying to the Local Plan are set out below and have been discussed over the plan preparation period through partnership liaison and meetings. Some are the subject of the Statements of Common Ground with key bodies. This section outlines the ongoing work undertaken with partners to address any issues identified. It also highlights areas of agreement or matters which require further work. It recognises some previous work but additionally is set out to demonstrate commitment to the new Castle Point Plan.
- 12.2. Key strategic matters for the Castle Point Plan are:
  - Housing, including Gypsy and Traveller needs
  - Economic Growth, Employment and Retail needs
  - Green Belt
  - Mitigation and adaptation to Climate Change
  - Green Infrastructure/Green Grid
  - Transport Infrastructure
  - Health and well being
  - Communications Infrastructure
  - Infrastructure Delivery Plan
  - Protection and enhancement of the natural and historic environment

## **13. Strategic Issue: Housing Need and Supply**

- 13.1. At the Regulation 18 “Issues and Options” consultation stage which ran from 22 July to 16 September 2024 the Council applied the Standard Methodology calculation as required in the 2023 version of the NPPF at the time which indicated a minimum local housing need of 351 dwellings per annum.
- 13.2. In parallel, the Council undertook a borough-wide Call for Sites and a detailed urban capacity review, prioritising brownfield land and sustainable urban locations. This approach reflected both community feedback and the Council’s longstanding commitment to protecting the Green Belt.
- 13.3. On 12 December 2024, the Government published a revised NPPF, which introduced a new Standard Method for calculating housing need and confirmed that all plans submitted after 12 March 2025 would be examined under the new framework. The revised method increased Castle Point’s minimum housing need to 686 dwellings per annum. The latest calculation of the local housing need using the Standard Method as of June 2025 puts the housing need at 668 dwellings per annum.

- 13.4. However, Castle Point has significant environmental and physical constraints to growth. It is a small borough of 17.4 square miles in size with a population density of 4,976 per square mile, with an average housing delivery of 100 dwellings per annum. Over half of the borough (53%) is designated Green Belt and most of the borough is low lying land below sea level, resulting in nearly 50% of it falling within flood zone 3.
- 13.5. Following the revised NPPF in December 2024 and the new Standard Methodology for calculating housing need, noting NPPF paragraph 11 and the exemptions under Footnote 7, the Council decided to continue to proceed with the Castle Point Plan and updated its evidence accordingly.

### **Updated Evidence Base and Capacity Testing**

- 13.6. CPBC commissioned various pieces of work to review land availability throughout the Local Plan Making process including earlier work on Strategic Land Availability and Urban Capacity January 2023 and the Borough wide further evidence was prepared including a technical paper July 2024 which identified land availability outside of Green Belt, this looked at density modelling and site identification for the most effective use of this land for development. CPBC also prepared a Green Belt Assessment July 2025<sup>11</sup> as guided by the NPPF to identify potential Grey Belt sites for development. Identified sites were reviewed against further criteria: designated habitat and heritage sites; flood risk zones; transport constraints e.g. access issues or requirements for significant upgrades on highways impacting viability; and sustainability criteria. This work is described in the Housing Capacity Topic paper July 2025<sup>12</sup>. Additional to this, CPBC prepared the Strategic Land Availability Assessment July 2025<sup>13</sup> and Site Assessments for Canvey Island<sup>14</sup>, Benfleet, Hadleigh, Thundersley and Daws Heath<sup>15</sup> July 2025<sup>15</sup>. The approach to site assessments is supported by the Sustainability Appraisal July 2025.<sup>16</sup>

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<sup>11</sup> [Castle Point Green Belt Assessment July 2025](#)

<sup>12</sup> [Housing Capacity Topic Paper August 2025](#)

<sup>13</sup> [Strategic Land Availability Assessment July 2025](#)

<sup>14</sup> [Strategic Land Availability Site Assessment Canvey Island July 2025](#)

<sup>15</sup> [Strategic Land Availability Site Assessment Benfleet, Thundersley, Hadleigh, Daws Heath July 2025](#)

<sup>16</sup> [Sustainability Appraisal Main Report July 2025](#)

- 13.7. Castle Point Borough Council is seeking to secure its housing growth within the existing urban areas by optimising urban land through regeneration and renewal. It is considered that through this approach the Council can meet a locally assessed requirement for a minimum of 6,196 homes over the plan period from 2026 – 2043 (an average of 364 homes per annum). It is not however, possible to deliver housing growth substantially above this level without impacting on the fundamental purpose of the Green Belt, on nature conservation, on key heritage assets, or by increasing the risk from flooding. Through NPPF Paragraph 11 and Footnote 7, national policy accepts there are circumstances for Local Authorities to make a case for setting a lower housing target where there are constraints affecting the area, including Green Belt and Flooding. The PPG is clear that these arguments must then be justified through its evidence base assessments. The Council believes it has done this.
- 13.8. Castle Point Borough Council has strong housing market links with its neighbouring authorities, and this was borne out of historic joint strategic housing need assessment studies prepared by the South Essex Councils (formerly Association of South Essex Local Authorities).
- 13.9. South Essex authorities have historically struggled to meet their own housing targets and similar to Castle Point have various constraints to growth including Environmental factors e.g. constrained by the sea, areas at high risk of flooding, designated habitat sites or Green Belt, or infrastructure constraints.
- 13.10. Following the EPOA mechanism for considering unmet housing need 2017, in January 2025, Castle Point wrote to neighbouring local authorities asking for assistance in meeting the Borough's unmet housing needs, Letters were sent to the following Essex Local Authorities: Rochford Council, Basildon Council, Brentwood Council, Southend on Sea City Council and Thurrock Council. The letter is included in the appendices. No authority was able to assist Castle Point with their unmet need. While the Council cannot meet the full Standard Method requirement, it is satisfied that the locally assessed need cannot be met within the borough boundary without other forms of assistance from neighbouring authorities being available.
- 13.11. The Council has since received letters from the neighbouring authorities of Basildon and Southend on Sea requesting assistance to meet their unmet housing need. The Council has replied to these stating that it is unable to assist.
- 13.12. The issue of housing need across South Essex has been discussed at one-to-one meetings with individual neighbouring authorities as well at South Essex Council Joint Officer Group. Led by Castle Point, it was decided by all South Essex Authorities at a meeting on 13<sup>th</sup> October 2025 to work together on a joint position statement on housing need in South Essex. A final draft was drawn up with input from all authorities at a meeting on 8<sup>th</sup> December to provide the South Essex Joint Position on Housing Need.

13.13. Within the Statements of Common Ground between Castle Point and each of its neighbouring authorities, it is agreed that Castle Point has not met the Standard Method for Housing Need and that it has significant environmental and physical constraints which hinders meeting this housing need, and that South Essex Authorities would continue to work together to discuss an appropriate approach to meeting the housing needs in South Essex. Copies of the Statements of Common Ground can be found on the Examination website.

## **14. Gypsy and Traveller Accommodation**

- 14.1. Castle Point has accommodated for all of its Gypsy and Traveller Pitch need through the intensification of pitches at Orchard Place and Janda Fields. Some neighbouring authorities are struggling to meet their Gypsy and Traveller Pitch Need and Castle Point has received a request under the Duty to Cooperate from Brentwood and Basildon to assist with their unmet need. Castle Point has only the capacity to meet its own needs.
- 14.2. In September 2025, Basildon Council suggested inviting all South Essex Authorities to a workshop to discuss the accommodation needs for Gypsy and Travellers across Essex which Castle Point will take part in. However, no dates for this event have been confirmed.
- 14.3. The EPOA programme is currently conducting a study into transit site requirements within Essex. Castle Point will work with this study and with other authorities to address these requirements.
- 14.4. The EPOA mechanism for considering unmet Gypsy and Traveller Accommodation has been used for considering this issue. Statements of Common Ground between Castle Point and Brentwood around this issue have been agreed.

## **15. Housing Strategy**

- 15.1. Castle Point's housing strategy focuses on brownfield redevelopment, regeneration of town centres and urban intensification. Particular areas of focus are along London Road, the town centres of Canvey, Hadleigh, South Benfleet and Tarpots. Allocated sites for regeneration and redevelopment would be master planned as outlined in the Design policies in the Castle Point Plan.
- 15.2. Some sites include community facilities and services such as education, health facilities, children play areas, community halls. Often these are in old buildings, which have issues in accommodating these services and use the site inefficiently with large areas of car parking. The council considers there is an opportunity to develop these sites more effectively and provide better accommodation to service these community uses.

- 15.3. The Council is working with neighbouring authorities such as Southend on Sea to develop design and density guidance for London Road, with Essex County Council to secure the educational facilities at Kiln Road and Essex Police to provide crime resistance design in town centre locations through master planning exercise.
- 15.4. Statements of Common Ground have been drawn up to support this work with Southend on Sea, Essex County and Essex Police.

## **16. Economic Growth and Employment / Retail**

- 16.1. The South Essex Councils joint working relationship looks at strategic opportunities across South Essex and has workstreams related to Economic Development.
- 16.2. Castle Point helped to develop the SEC work programme on the preparation of a "South Essex Framework" which aims to assist in economic development by focussing on the South Essex 2050 Vision to progress critical infrastructure projects and infrastructure led housing delivery. SEC also commissioned a South Essex Economic Growth Action Plan with the purpose of boosting the region's economy, with the ambition of £15bn growth and 100,000 jobs by 2050 through major infrastructure, digital connectivity, skills development, and leveraging key sectors like green tech and manufacturing, focusing on key projects like the [Thames Enterprise Park](#) and improving transport corridors like the A127.
- 16.3. The SEC continues to work towards the South Essex 2050 vision in providing the infrastructure and investment to support all of South Essex. The Castle Point Plan's Vision and Objectives are in accord with the South Essex 2050 vision.

## **17. The Green Belt and Strategic Land Use Planning**

- 17.1. The Borough is within London's Metropolitan Green Belt with 53% designated as Green Belt. As mentioned in the housing matter above, once it became clear that Castle Point Council would be unable to meet its housing needs as assessed under the new December 2024 NPPF in full without Green Belt release, Castle Point prepared a Green Belt Review according to NPPF guidelines in July 2025.

17.2. The Council has cooperated effectively with its neighbours on the matter of Green Belt including coordination with Basildon and Thurrock on Green Belt review methodologies to ensure a consistent sub-regional approach as well as with other authorities. Castle Point will continue to engage with its neighbours as they prepare their own Green Belt reviews.

## **18. Climate Change and Flood Risk Management**

18.1. The Environment Agency (EA) is the lead authority for the management of tidal and main river flooding in Castle Point. It owns and manages the flood defences on and around Canvey Island. In order to manage flood risk on the Thames, the EA through extensive evidence base work and engagement with stakeholders has put in place the Thames Estuary 2100 Plan (TE2100 Plan) aimed at managing flood risk on the Thames. This identifies the actions which needs to be taken now and in the future as climate change impacts the region.

18.2. The Council is also one of a number of partners preparing the Riverside Strategy, alongside the Environment Agency and neighbouring local authorities. The area to be covered by the Riverside Strategy overlaps significantly with the Central Marshlands component of the South Essex Estuary Park initiative.

18.3. Castle Point, Southend on Sea, Basildon and the Environment Agency meet biannually to progress the Riverside Strategy, along with other stakeholders in South Essex to deliver the Thames Estuary 2100 Plan. The plan aims to improve and manage flood defences, enhance ecological networks and enhance cultural and social value of coastal areas by improving access to them. The Riverside Strategy is reflected in Policy ENV2 of the Local Plan.

18.4. The South Suffolk and Essex Shoreline Management Plan has also been prepared with the Environment Agency. The Prittle Brook in Hadleigh is a Main River which flows into the Crouch Estuary and is covered by that plan and the Castle Point Plan has regard to this work.

18.5. ECC meanwhile, as the Lead Local Flood Authority (LLFA), is responsible for groundwater flooding, surface water (rainfall) runoff and ordinary watercourses (streams and ditches). ECC seeks to prioritise the use of sustainable drainage systems (SUDS) for all new developments. ECC is consulted on every SUDS application received to assist with the accurate determination of each application in accordance with the LLFA's position.

18.6. The following joint evidence base documents have been produced with the involvement of the EA and the LLFA:

- Castle Point Strategic Flood Risk Assessment (SFRA), Level 1 & 2 March 2025 – identifies the risk of flooding across the area now and in the future taking into account climate change.

- Castle Point Strategic Flood Risk Assessment (SFRA) Level 1 & 2 Update December 2025- identifies the risk of flooding across the area now and in the future taking account of latest flood risk modelling maps, greater climate change allowance and identifying critical drainage areas for proposed housing allocations

18.7. CPBC has also collaborated with EA on various environmental strategy documents, and these include the EPOA Planning Policy Statement- Operation Energy and Carbon (Net Zero) October 2025, and the Work of the Essex Climate Action Commission, the Essex Local Nature Recovery Strategy and the Essex Recreational Avoidance and Mitigation Strategy. All of which have been implemented across South Essex authorities.

18.8. Comments to help improve the soundness of the plan were proposed by the Environment Agency, ECC as the LLFA and by Anglian Water in response to the Issues and Options consultation and the pre-submission draft. These were taken into account with modifications proposed where considered necessary to the soundness of the plan. At this time Statements of Common Ground are being finalised with the Environment Agency and ECC. Details of DTC Meeting with EA, ECC and their comments on Reg 19 Plan are included in the appendix.

## 19. Green Infrastructure and Open Space

19.1. Since 2017 authorities in east and central Essex have been working together on an Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) and have produced an SPD. The purpose of this is to secure avoidance and mitigation measures which reduce the impact of growth on recreational disturbance at these important sites. Castle Point, along with the majority of other Essex partners have now adopted the RAMS strategy and is collecting the tariff. Castle Point has participated in the Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) implementation.

- 19.2. At a South Essex level meanwhile, there is a long history of joint working on Green infrastructure projects in South Essex. In 2017, it was recognised by the constituent authorities in South Essex that there may be scope for securing improvements to Green Infrastructure by better joint working. Part of this work included a Joint Playing Pitch and Built Facilities Strategy. Knight, Kavanagh & Page Ltd (KKP) were commissioned by the South Essex authorities of Basildon, Castle Point, Rochford and Southend-on-Sea, together with Essex County Council and Sport England, to assess outdoor sport facility needs across the individual local authority areas. This work led to additional pitch provision as well as an overarching strategy for South Essex. This evidence has been used to inform the Castle Point Plan and the approach to the provision of Sport England facilities and been the basis for further detailed work on Sports Provision in Castle Point through collaboration with Sport England.
- 19.3. Castle Point collaborated in the production of the South Essex Green and Blue Infrastructure Strategy, which sets out a long-term vision and action plan for a 'regional park' across all six boroughs, which improves accessibility to green areas and open spaces; improves active transport and provides a context for new development and place making. This now forms part of the SEC work programme and has informed the Castle Point Plan.
- 19.4. Separately, Essex County Council has prepared an Essex Green Infrastructure Strategy which was approved in early 2020. Castle Point contributed to the project through the EPOA and made inputs to the workshops held.
- 19.5. The Council has also worked with other relevant organisations including Natural England and groups in the implementation of the Local Nature Recovery Strategy which aims to deliver initiatives for nature recovery and identify areas of importance for biodiversity and where habitat creation or improvement can provide benefits for nature.
- 19.6. The Castle Point Plan reflects the findings of this evidence and comments from key stakeholders in this area within its environment policies. The Council will continue to work with these bodies to implement improved green and blue infrastructure, enhanced open spaces and provision of playing pitches and the provision of biodiversity improvements across the borough.

## **20. Transport Infrastructure and Strategic Corridors**

- 20.1. The key transport routes throughout Essex are the M25 and M11 motorways and A12, A127, A13, A120 and A130 which link Essex to London, the East Coast and the rest of the country. There is significant congestion at peak hours on the shared transport network particularly peak times on the A127, A130, Rayleigh Road and the Fairglen junction which is a bottle neck for traffic along the A130 and A1245.

- 20.2. Private cars are the predominant mode of transport in South Essex owing to the lack of public transport; key bus routes are frequently delayed as a result of traffic congestion and lack of priority routes, commuter trains to London from South Essex are often overcrowded and there are limited cycle and walking network across the sub region. The substantial growth planned for South Essex is likely to exacerbate the situation without significant improvements to transport infrastructure to support it.
- 20.3. The A127 or Southend Arterial Road provides a strategic east to west route across South Essex stretching from Southend through Brentwood to London Borough of Havering and is the administrative boundary between Castle Point and Rochford. The road provides direct access to the M25, A130 and A13 which leads to Thurrock. It is not trunked and spans three highway authorities and five local planning authorities. It is also a key employment land corridor for Brentwood and Basildon boroughs. The route already experiences significant capacity issues, particularly at key junctions such as Fairglen Interchange a crucial link at Benfleet connecting the A127 to A130 for Chelmsford and Canvey Island and the Rayleigh Weir Interchange which connects A127 to A129 Rayleigh to Hadleigh.
- 20.4. As part of its transport evidence base the Borough Council has prepared a Strategic Transport Assessment. The assessment model takes account of future growth in neighbouring planning authorities. These assessments have been reviewed by Essex County Council.
- 20.5. Junction Modelling has been included in Castle Point's Transport Assessment report and assessed the likely impacts of Castle Point's planned growth on the surrounding highway network. The transport assessment includes a high-level analysis of cross boundary traffic flows on key highway links including A13/London Road, A127, Rayleigh Weir Interchange and Fairglen Interchange and further transport assessments will be carried out together with neighbouring authorities as housing allocations come forward during the local plan period.
- 20.6. The Castle Point Plan is further along the local plan making process than its neighbours, who are currently preparing their local plans and developing their housing strategies to accommodate the expected significant growth across South Essex. As these local plans come forward, their transport assessments along with Castle Point's transport work will add to the evidence and provide greater granular detail of the impact of this cumulative growth on the transport network.
- 20.7. Essex County Council is the local Highways and Transportation Authority and is responsible for local transport planning and the provision and maintenance of the highway network for all Essex authority areas except Southend on sea and Thurrock. It also prepares the Local Transport Plan. This is currently being updated to LTP4 with the collaboration of all Essex district, borough and unitary authorities. Essex is currently entering a transitional phase, with the election of a Mayor for Greater Essex and changes to local government

structures as a result of devolution and local government reorganisation, but Essex County Council with the collaboration of Essex authorities are finalising the preparation of LTP4 to support the new structures once they are in place as well as guide the development in emerging local plans.

- 20.8. The Council has engaged with both Essex County Council (as Highways Authority) throughout the preparation of the Local Plan and have discussed the proposed development growth proposals with them. There are regular liaison meetings with Essex County Council to discuss strategic transport matters. Representations were received from Essex County Council at each formal consultation stage of the preparation of the Castle Point Plan.
- 20.9. The SEC authorities and the London Borough of Havering have prepared a statement of common ground<sup>17</sup> with regards to the issues for sustainable growth and plan making that the A127 Transport Corridor presents. The Highway Authorities are also developing a joint Implementation Plan as part of the A127 Corridor for Growth (The Route Management Strategy) and along with the A127 Corridor Engagement Group are making the case for the A127 to be re-adopted as a trunk road<sup>18</sup>.
- 20.10. The A127/A130 Fairglen Interchange lies at a key point on the transport network for South Essex, forming a strategic connection between the A13, A127, A130 and A1245 and experiences severe congestion. Improvements for this interchange has been given the green light with investment funding from Central Government, Essex County Council and Southeast Local Enterprise Partnerships to provide improvements which are expected to be in place by 2027
- 20.11. The Rayleigh Weir Interchange is also a key point along the A127. The Southeast Local Enterprise Partnership has proposed under the A127 Network Resilience plan to upgrade traffic signals and improve linkage through a split cycle offset optimisation technique (SCOOT) to prevent vehicles from backing up onto the A127.
- 20.12. The congestion on the transport network is a significant barrier to growth and all the South Essex Authorities including Castle Point support and are actively involved in these initiatives for improvements to the A127, the Fairglen Interchange and the Rayleigh Weir Interchange.
- 20.13. All South Essex Authorities have agreed to have regard for the Local Transport Plan within their local plan and agreed to continue to collaborate to work towards easing movement across the region which is reflected in Statement of Common Grounds.

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<sup>17</sup> SoCG A127 Corridor

<sup>18</sup> [A127 Economic Growth Corridor | Essex County Council](#)

## **21. Education Provision**

- 21.1. The Council has collaborated with Essex County Council in its capacity as education authority to assess the impact of the proposed level of housing growth on school places during the Plan period to ensure that sufficient provision is provided for. This has been included in the Infrastructure Delivery Plan.
- 21.2. Essex County prepared a cumulative assessment based on the level, type and location of growth across the borough. This was updated following the Regulation 19 consultation and the resulting work fed into the Infrastructure Delivery Plan.
- 21.3. Safeguards on the protection of educational facilities have been put in place within the local plan in INFRA02 and amendments to the definition of educational buildings have been made following Essex County Council's comments to the Regulation 19 draft.
- 21.4. One area of disagreement remains around the removal of educational buildings from exception circumstances for development within the Green Belt. As Castle Point is such a small borough and its plan proposes considerable urban intensification, the Green Belt's role has become more vital in avoiding urban sprawl and maintaining important green space for residents to enjoy. Consequently, the Council considers that any development including school expansion within its Green Belt would encroach on the integrity of the Green Belt for now and the future.
- 21.5. A Statement of Common Ground has been prepared between Castle Point and Essex County Council to reflect those areas of agreement and disagreement.

## **22. Health and Wellbeing Coordination**

- 22.1. Castle Point consulted the Mid and South Essex Integrated Care Board during the preparation of the Local Plan. The ICB was given the opportunity to respond to the Castle Point Plan and Infrastructure Delivery Plan. The comments and responses received has informed the preparation of the Local Plan and assisted in the identification of specific policy requirements.
- 22.2. The Council has collaborated with the NHS, Public Health and other partners through the Southeast Essex Alliance and the Castle Point and Rochford Health and Wellbeing Board to address issues and priorities emerging through the Joint Strategic Needs Assessment (JSNA), 2022 and the Essex Joint Health and Wellbeing Strategy. The JSNA is a profile of people living in Castle Point, setting out information on health and wellbeing of residents in the Borough and informs the Local Plan and its policies. Public health is a responsibility of ECC. The public health team at ECC have been working with officers at CPBC and

within the other local planning authorities to ensure that plans bring about positive outcomes for existing future residents.

- 22.3. This cooperation has resulted in the inclusion infrastructure and design policies to ensure better health outcomes for residents of the Borough.
- 22.4. Locally, the Local Strategic Partnership which consists of statutory bodies and voluntary community groups help deliver positive change within the South Essex area. These partnerships include Health & Wellbeing, Community Safety, Community Development.
- 22.5. The Essex Joint Health and Wellbeing Strategy 2022-2026 sets out to reduce the numbers of people becoming dependant on health and adult social care by facilitating the best conditions for carers to operate.
- 22.6. The Council is satisfied that it has engaged cooperatively and on an ongoing basis on strategic health and wellbeing matters with key partners and relevant prescribed bodies.
- 22.7. In addition, the Council has undertaken consultation with infrastructure providers as part of the Infrastructure Delivery Plan. These have informed the Local Plan and the IDP supporting the Castle Point Plan. The Site Allocation Policies in the Castle Point Plan and the IDP address transport and highways issues and establish the requirements for sustainable transport measures as informed by the Castle Point Local Walking and Cycling Plan considered essential to enabling development.

## **23. Specialist and Supported Housing**

- 23.1. Essex County Council published their report on Supported and Specialist Housing and Accommodation Needs Assessment December 2025<sup>19</sup> after the Regulation 19 Consultation. Following meetings with Essex County Council, some modifications have been included were appropriate to the Castle Point Plan to reflect the findings of this report and recorded in the Statement of Common Ground

## **24. Communications Infrastructure**

- 24.1. The Council is a partner on the rollout of a Local Full Fibre Network across parts of South Essex which will connect public sector assets to a super-fast network and continues to contribute to progressing improvements in the digital network via South Essex Council.

## **25. Conclusions**

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<sup>19</sup> [Supported and Specialist Housing and Accommodation Needs Assessment \(2025\) | Essex Open Data](#)

- 25.1. The report has provided a summary of the collaborative work which Castle Point Borough Council has carried out to date to address strategic and cross boundary issues that have been identified in the preparation of the Local Plan. The report outlined how organisations have been involved in this work, the key issues that have been identified and how the plan has been shaped by the ongoing engagement.
- 25.2. The Council considers it has positively fulfilled its responsibilities through Duty to Cooperate legislation, as demonstrated by the information outlined within this report and it will continue to do so in the future. The Council has worked jointly with neighbouring authorities, ECC and prescribed bodies throughout the preparation of the new Local Plan in a comprehensive and strategic fashion and on an ongoing basis to maximise the effectiveness of plan-making. To ensure that cooperation continues working arrangements have been, and will continue to be, determined between the relevant parties.
- 25.3. The representations to the pre-submission Castle Point Plan 2026-43 indicate very few matters of disagreement when it comes to neighbouring authorities, the County Council, or prescribed bodies. This Duty to Cooperate Statement has set out the steps taken by the Council to co-operate with local authorities and prescribed bodies on cross-boundary strategic matters, and the outcomes that have been achieved through this co-operation. The Council considers the engagement on strategic cross-boundary issues fulfils the statutory requirements and has been demonstrably constructive, active and undertaken on an ongoing basis.
- 25.4. The Council will continue to engage with its neighbouring authorities and other prescribed bodies on an ongoing basis in order to identify and address cross-boundary issues. This approach will help ensure that liaison with neighbouring authorities and other prescribed bodies remains fully embedded within the plan-making process.
- 25.5. The Council is currently in the process of developing a number of Statements of Common Ground which will set out the relevant strategic matters and how these have been resolved. These will be progressed and developed through the Regulation 19 consultation period and will accompany the Plan for submission and Examination. The Council is currently working on these statements with:
  - Neighbouring Authorities
  - Highways Authority
  - Environment Agency
  - Natural England and;
  - Historic England

25.6. Castle Point Borough Council remains committed to maintaining constructive and ongoing engagement with neighbouring authorities and prescribed bodies throughout the examination process and beyond.

## 26. Record of Engagement

### Meeting Schedule and Frequencies

26.1. The table below set out details of ongoing planning related meetings and workshops to date that CPBC officers have participated in as part of the Duty to Co-operate. These meetings cover a broad range of topics, involving information sharing and best practice.

Scheduled Frequency	Description of work/ meetings / workshops
Monthly	<p>SEC Joint Officers Group</p> <p>Planning Officer meetings and workshops. Discussion of cross boundary issues, best practice, local development plan progress, sub-regional planning across South Essex.</p>
Monthly	<p>South Essex Economic Development Managers meeting.</p> <p>Discussion of cross boundary issues, funding bids, best practice across South Essex.</p>
Quarterly	<p>SEC (Association of South Essex Local Authorities) Leaders and Chief Executives</p>
Quarterly	<p>EPOA planning policy and development management forums.</p> <p>Facilitates the sharing of good practice and facilitation of cooperation and joint working on issues of a strategic nature and common interest across Greater Essex.</p>
Quarterly	<p>EPOA meetings.</p> <p>Facilitates the sharing of good practice and facilitation of cooperation and joint working on</p>

<b>Scheduled Frequency</b>	<b>Description of work/ meetings / workshops</b>
	issues of a strategic nature and common interest across Greater Essex.
Quarterly	Castle Point Regeneration Partnership  Held with key statutory consultee partners focussing on project delivery and supporting growth, the economy and environmental matters
Quarterly	Castle Point and Rochford Local Strategic Partnership  Held with key statutory consultee partners focussing on project delivery and supporting growth, community, safety and health matters
6 monthly	Essex Planning Portfolio meetings
Monthly to Bimonthly	One-to-one meetings with neighbouring local authorities; including Basildon, Rochford, Thurrock, Southend, Chelmsford as required and joint working on specific issues
Monthly	One to one meetings with Essex County Council in respect to those services which the County Council is responsible and Castle Point Development.
Biannually	Riverside Strategy. EA, Rochford, Southend, Thurrock
Quarterly	Essex Coastal Recreational Impact Avoidance and Mitigation Strategy

## 26.2. Appendices

- Record of Duty to Cooperate Engagement (meetings and minutes)
- Duty to Cooperate letters
- Statement of Common Grounds

