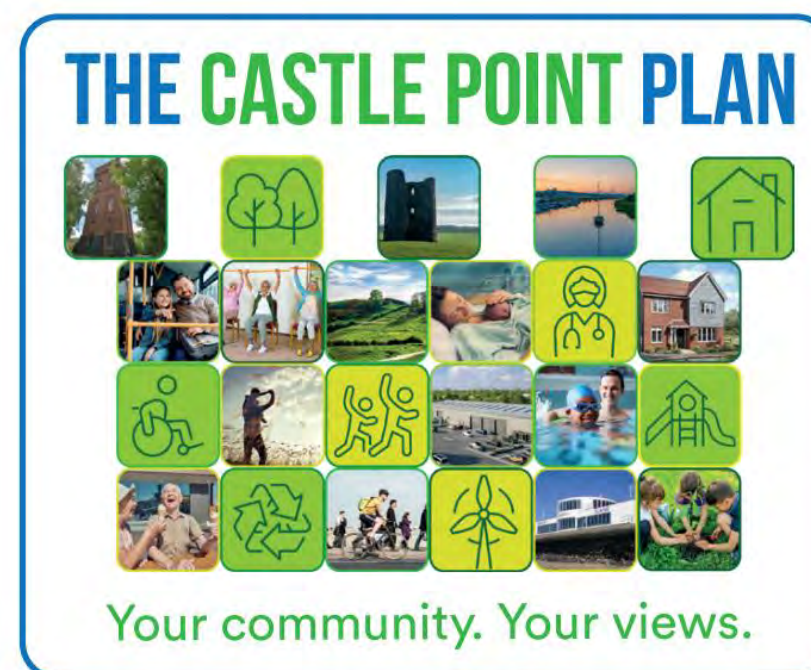




Regulation 19 Consultation Spreadsheet
Representations and Responses to the Castle Point Plan

Ordered by ID number

January 2026

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. So und?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0001-0001	Individual	John	Butt		Yes	SP3	Not Stated	If further developments on Canvey Island then a third road for access on and off the Island required. A third road has been promised since the 1980s for further access to Canvey Island. It's taken you 40 years to finish the sea wall. Now it is 49 years overdue for a Third access road to Canvey Island	Not Stated	Not Stated							Objects to housing development in Canvey island. Development on Canvey needs a third access road, promised since the 1980s and still undelivered.	Noted. Development must demonstrate infrastructure sufficiency or secure mitigation, as set out in INFA policies.	N
0002-0001	Duplicate representation received. See representation 0627-0001.												Yes						
0003-0001	Duplicate representation received. See representation 0001-0001.																		
0004-0001	Individual	Pauline	Smith		Yes	SP3	Not Stated	I have just read that you are proposing a further 3000 homes on Canvey I would like to express my strongest opposition to to any further development we are already overloaded the roads are congested at all times of the day ,God help us if there was a Major incident	Not Stated	Not Stated			Not Stated		No		Objection to further housing development in Canvey	Noted	N

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0005-0001	Individual	Ed	King		Yes	SP3	Not Stated	I strongly oppose the plan to build more houses / dwelling on Canvey Island. As a local I am amongst thousands of residents that strongly feel the Island is already vastly over populated which poses an extremely High Risk to the islander's safety...! As you are aware there is only ONE main route off the island - what needs to be addressed is better Access and Egress for as things stand, we are sitting ducks in the event of an explosive related incident / accident . So this is our priority, NOT more housing which will massively exacerbate our safety and wellbeing. No, No, No to more housing!!	Not Stated	Not Stated			Not Stated		No	A	Objection to further housing development in Canvey. Concerns over access to Canvey.	Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan	N
0006-0001	Individual	Anne	Meecham		Yes	SP3	Not Stated	I have lived on Canvey for [REDACTED] a lovely place back then with a thriving Town centre and also a quaint nice looking place to live....fast forward to now and it has become just a glorified housing estate with now numerous flats going up everywhere, the flats aren't a bad thing as we need accomodation for youngsters first step on the property ladder but we are becoming over burdened. So when I read that there is	Not Stated	Not Stated			Not Stated		No		Long-term resident objects to overdevelopment on Canvey Island, citing loss of character, access, lack of infrastructure, flood risk, and ignored open space evidence.	Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better	N

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								a proposal for 3.000+ more buildings coming (I had to go back and read that again in shock) !! We cannot possibly take any more, as everyone says before me, there is ONE roundabout to get off here, (since I moved here in 1970s) we have been promised another road off not from the roundabout somewhere else!.From about 1.30pm we are gridlocked coming onto the Island, awhile back we used to have emergency places to go to if there was an emergency on Canvey, see that has evaporated, well apart from swimming there would be no way off the Island especially if you are disabled!! Everytime we have a downpour there is about a foot of water laying on the road surface.! So more building means even more surface water, the drains just cannot cope but you know this already!! We need open greenland spaces for mental chill out times, it is so important especially now with so much going on in our lives, we have lost so much already... I'm sure if the powers that be could find a way to build on the sea they would!.....Please don't take away our remaining bits of land it is just so unfair to put most of the proposed buildings on to our Island...												Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Infrastructure Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs Policy SD3 covers SuDs and	

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								What was the point in doing that extensive/ expensive survey a few years ago about open spaces and how it affects us if you are going to just ignore that outcome!!										part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Open Space standards set by Policy Infra3 and supported background evidence (Open Space Assessment 2022)	
0007-0001	Individual	Bruce	Cochrane		Not Stated	T1	Not Stated	I am concerned that as a resident of Canvey Island for the last [REDACTED] that the road infrastructure is not adequate for more housing development our community doesn't want any more large housing projects unless they can get a traffic plan in place If you have to phone a emergency vehicle when the traffic is heavy you can possibly die or your house can burn down as nothing moves at rush hours not hours	Not Stated	Not Stated			Not Stated		No		Resident objects to further housing on Canvey Island due to inadequate road infrastructure and emergency access risks.	Noted. Infrastructure needs established in INFRA policies supported by background evidence Infrastructue Delivery Plan (IDP) Policy INFRA1 requires transport impacts to be assessed and mitigated.	N

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0008-0001	Individual	Don	Liddard		Yes	SP3	Not Stated	I am really pleased that some of the green belt sites have been removed, but was surprised that the North West corner area {Blinking Owl} was left out, this area is perfect location.	Not Stated	Not Stated			Not Stated		No	A	Opposed to development on Green Belt land, but Supports North West Thundersley (Blinking Owl site) for housing.	Noted North-West Thundersley Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	N
0009-0001	Individual	Robert	Sharp		Yes	SP3	Yes	Dear Sir Thank you for your Aug 1 Consultaion The citizens of Castle Point are concerned that the thought of introducing further housing without addressing the existing major road congestion would be intolerable. As I am sure you know, unacceptable traffic congestion already occurs every morning and evening in Benfleet, Canvey & Hadleigh. This will only get worst with the housing	Yes				Not Stated		No	A	Resident objects to further housing due to severe traffic congestion in Benfleet, Canvey, and Hadleigh, and calls for new access roads before any development proceeds.	The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected	N

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								expansion already planned for Southend and Shoebury as the only access is via CastlePoint. Every new house tends to add two cars. Action should be taken as follows: 1) Before any new housing estates are even considered, new access roads need to be built in Benfleet, Hadleigh & Canvey 2) This may be possible from Canvey by a road to link with further up the A13 at Fobbing thus easing Canvey Way/A13 junction. Also possibly a link direct to Leigh for access to Southend. 3) More difficult however, is adding new access roads in South Benfleet and Hadleigh. The area is already congested with housing which proves our concern, we cannot build any more major housing except maybe the odd fill ins. 4) This suggests more housing would be impractical for traffic reasons, in addition to increase in demand for doctors, schools and other essential services. You state that 'delivery of development accords with the needs of the area', exactly, and more housing is not a demand for the residents in CP. I would appreciate your views when available and I am ready to											Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Infrastructure Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	

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								meet if you need me to attend any meetings.											
0010-0001	Individual	Neal	Garner		Yes	SP3	No	“The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council’s decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan.	No	Not Stated	To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the	I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.	Not Stated		No	A	Welcomes the decision not to allocate Green Belt land. But suggests NW Thundersley should have been considered. Argues the Plan fails to demonstrate a deliverable five-year supply. Strongly objects to over-allocation on Canvey Island due to flood risk, drainage limitations, and lack of a third access road. Criticises the exclusion of North West Thundersley (Blinking Owl site), which he sees as a more sustainable and infrastructure-led alternative. Also questions the sites SA assessment. Concerned over evidence of Duty to Cooperate.	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and	N

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								This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However,I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded ‘Blinking Owl Site’. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I			Government’s target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government’s housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government’s impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines										also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.). • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								acknowledge that, the Council’s approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council’s removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a			the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island’s already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS’ measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island’s unique geography and drainage infrastructure. The island’s low elevation,								

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								sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. While the draft Plan identifies a range of mitigation measures, it does not yet provide enforceable delivery mechanisms. Without clear implementation pathways, these measures risk remaining theoretical rather than practical. Perhaps			high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey’s ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council’s plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local								

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								most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan’s credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns;			constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of								

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								they are the legal safeguards that ensure development is sustainable, justified, and in the public interest. Soundness of the Plan T Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in			the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village								

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								the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle			area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential.								

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								Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development											

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								would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the											

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								Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included											

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								in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating											

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								growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply.											

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								Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland’s Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current												

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								and future residents of our Borough. “											
0010-0002	Individual	Neal	Garner		Yes	For word	No	A key statutory requirement is the ‘Duty to Cooperate’. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No	Not Stated			Not Stated		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0011-0001	Individual	James	Robbins		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend,	No	Not Stated	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is	I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate. The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000	Not Stated		No	A	Supports Green Belt protection but argues the Plan fails to justify its housing shortfall or demonstrate a deliverable five-year supply. • Duty to Cooperate is a particular shortcoming - absence of clear and binding agreements. • Strongly objects to over-allocation on Canvey Island due to flood risk, drainage limitations, and lack of a third access road. Suggests that standard SuDS solutions will not work on Canvey. • Criticises the exclusion of North West Thundersley (Blinking Owl site),	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. • Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was	N

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								or Rayleigh Weir. I welcome the Council’s decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However,I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded ‘Blinking Owl Site’. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a			investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland’s Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley					which he sees as a more sustainable and infrastructure-led alternative. SA fails to consider it properly. Calls for Plan modification to include North West Thundersley and reduce pressure on flood-prone areas. • 5 years housing supply not demonstrated (Just 53%) with reliance on constrained sites casting doubt on delivery. • Approach to biodiversity and environmental protection requires strengthening. f mitigation measures require enforceable delivery mechanisms andclear implementation pathways.	not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation). • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation and also the August 2025 North West Thundersley transport		

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								significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council’s approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: • Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. • The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. • The			and it has no credible five-year housing land supply. I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn’t meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island’s unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. The inclusion of the Charfleets Industrial estate								evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	

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								Council’s removal of several Green Belt sites is commendable and reflects strong community engagement. • North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. • The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. The Sustainability Appraisal, which underpins the Plan’s spatial strategy, also falls			as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes. The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our								

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								short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable growth in a well-connected location, has not been adequately assessed. While the Sustainability Appraisal acknowledges the option, it is given nowhere near enough consideration and the assessment of it lacks the depth of analysis applied to other alternatives. There is no transparent comparison of its sustainability performance, nor a clear justification for its exclusion. This omission undermines the credibility of the appraisal and raises legitimate questions about whether all reasonable alternatives have been properly considered. The Plan's approach to biodiversity and environmental protection also requires strengthening. Paragraph 180 of the NPPF makes clear that development should not proceed where it would result in significant harm to biodiversity or protected sites unless that harm can be fully mitigated. While the draft Plan identifies a range			communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible.								

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								of mitigation measures, it does not yet provide enforceable delivery mechanisms. Without clear implementation pathways, these measures risk remaining theoretical rather than practical. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan’s credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly			However,I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded ‘Blinking Owl Site’. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by								

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								in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest. Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in			infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest. Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible								

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								order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is			to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period.								

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								absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. The NPPF is clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in											

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								the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater,											

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								and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence base. The Sustainability Appraisal fails to assess											

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								North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey											

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								local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory											

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								Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and inaccessible land, and its											

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								development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages - one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed.											
0011-0002	Individual	James	Robbins		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No	Not Stated			Not Stated		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0012-0001	Individual	Eileen	Read		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend,	No	Not Stated	In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest. Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate.	Not Stated		No	A	Welcomes decision not to include Green Belt sites but warns it's meaningless without a deliverable housing supply. • Strongly objects to over-allocation of housing on Canvey Island due to flood risk, infrastructure strain, and unsuitable drainage systems. • Supports inclusion of North West Thundersley (Blinking Owl site) as a strategic growth location with better connectivity and lower environmental risk. • Criticises lack of robust evidence for reduced housing target and failure to	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was	N

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								or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a			policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately	North West Thundersley offers a strategic opportunity for sustainable growth.					demonstrate a five-year housing land supply. Argues the Plan is unsound and not legally compliant due to weak Duty to Cooperate, poor Sustainability Appraisal, and inadequate biodiversity safeguards.	not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation). - Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. - Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council’s approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. The Council’s			5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government’s impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts								

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								removal of several Green Belt sites is commendable and reflects strong community engagement. North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. The Plan’s approach to biodiversity and environmental protection also requires strengthening. Paragraph			doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island’s already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS’ measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island’s unique geography and drainage infrastructure. The island’s low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey’s ground conditions make this highly unlikely and risk creating new								

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								180 of the NPPF makes clear that development should not proceed where it would result in significant harm to biodiversity or protected sites unless that harm can be fully mitigated. While the draft Plan identifies a range of mitigation measures, it does not yet provide enforceable delivery mechanisms. Without clear implementation pathways, these measures risk remaining theoretical rather than practical. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive			flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite								

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								or poorly served by infrastructure.			its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island’s geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council’s commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of								

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											Canvey’s unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the								

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											Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for								

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											development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style								

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											West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor								

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											will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt								

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											designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan’s soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the								

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											tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland’s Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.“								

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0012-0002	Individual	Eileen	Read		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.	No	Not Stated			No t Sta ted		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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0013-0001	Individual	Kelly	McKenzie		Yes	SP3	No	Good afternoon, I'm disappointed that the consultation process is far too complicated for me to effectively express my views and I can't imagine I'm the only one finding it challenging! Therefore I have set out my response to your plan below: The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any	No	Positive, effective, justified, consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.	Not Stated		No	A	Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and inadequate infrastructure. • Supports inclusion of North West Thundersley (Blinking Owl site) as a more sustainable and accessible strategic growth location. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the soundness and legal compliance of the Plan under the NPPF, particularly regarding the Duty to Cooperate and Sustainability Appraisal. • Calls for modifications to reduce pressure on Canvey and include North West Thundersley.	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability	N

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								of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However,I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded ‘Blinking Owl Site’. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating			to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government’s housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government’s impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The								Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council's removal of several Green Belt sites is commendable and reflects			analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration								

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								strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a			trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey’s ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council’s plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West								

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								technical detail; it is a fundamental test of the Plan’s credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.			Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island’s geography								

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											and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better								

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											connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land								

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											provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from								

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											development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the								

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											gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip								

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											roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals.								

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											The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include								

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											North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that								

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											is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0013-0002	Individual	Kelly	McKenzie		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No	Not Stated			Not Stated		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0014-0001	Individual	Frances	Scarff		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend,	No	Positive, effective, justified, consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate.	Not Stated		No		Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and inadequate infrastructure. • Supports inclusion of North West Thundersley (Blinking Owl site) as a more sustainable and accessible strategic growth location. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the soundness and legal compliance of	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and	N

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								or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a			on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be	North West Thundersley offers a strategic opportunity for sustainable growth.					the Plan under the NPPF, particularly regarding the Duty to Cooperate and Sustainability Appraisal. • Calls for modifications to reduce pressure on Canvey and include North West Thundersley.	ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council’s approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The			fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island’s already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS’ measures								

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								Council’s removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year			routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island’s unique geography and drainage infrastructure. The island’s low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey’s ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council’s plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are								

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								housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan’s credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is			compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence								

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								sustainable, justified, and in the public interest.			base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance								

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											on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of								

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											housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the								

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											need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more								

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											suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to								

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											policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the									

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											Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and								

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											inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan’s soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland’s Green Belt. The Inspector								

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											found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0014-0002	Individual	Frances	Scarff		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No	Not Stated			Not Stated		No		Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0015-0001	Individual	Sam	McKenzie		Yes	SP3	No	Good afternoon, I'm disappointed that the consultation process is far too complicated for me to effectively express my views and I can't imagine I'm the only one finding it challenging! Therefore I have set out my response to your plan below: The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island,	No	Positive, effective, justified, consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate.	Not Stated		No	A	Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and	N

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								where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider			on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be	North West Thundersley offers a strategic opportunity for sustainable growth.					soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal. • Calls for modifications to reduce pressure on Canvey and include North West Thundersley.	ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council’s removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas			routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island’s unique geography and drainage infrastructure. The island’s low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey’s ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council’s plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are								

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								where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan’s credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly			compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence								

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								in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.			base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island’s geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council’s commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey’s unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance								

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											on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of								

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											housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the								

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											need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more								

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											suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to								

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											policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the									

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											Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and								

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											inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan’s soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland’s Green Belt. The Inspector								

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											found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0015-0002	Individual	Sam	McKenzie		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No	Not Stated			Not Stated		No		Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0016-0001	Individual	Cheryl	Redwin		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend,	No	Positive, effective, justified, consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate.	Not Stated		No	A	Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and	N

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											housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the								

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											need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more								

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											suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to								

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											policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the								

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											Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and								

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											inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan’s soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland’s Green Belt. The Inspector								

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											found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0016-0002	Individual	Cheryl	Redwin		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No				No t Sta ted		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0017-0001	Individual	Christopher	Knight		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend,	No	Positive, effective, justified, consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate.	Not Stated		No	A	Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and	N

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								or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a			on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be	North West Thundersley offers a strategic opportunity for sustainable growth.					soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal. • Calls for modifications to reduce pressure on Canvey and include North West Thundersley.	ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council’s approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The			fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island’s already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS’ measures								

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											inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan’s soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland’s Green Belt. The Inspector								

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											found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0017-0002	Individual	Christopher	Knight		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No				Not Stated		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0018-0001	Individual	Michael	Solkhon		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend,	No	Positive, effective, justified, consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate.	Not Stated		No	A	Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and	N

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								or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a			on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be	North West Thundersley offers a strategic opportunity for sustainable growth.					soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal. • Calls for modifications to reduce pressure on Canvey and include North West Thundersley.	ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council’s approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The			fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island’s already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS’ measures								

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								Council’s removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year			routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island’s unique geography and drainage infrastructure. The island’s low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey’s ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council’s plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are								

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								housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan’s credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is			compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence								

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								sustainable, justified, and in the public interest.			base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance								

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0018-0002	Individual	Michael	Solkhon		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No				Not Stated		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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0019-0001	Individual	Andrew	Gosnold		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend,	No	Positive,Effective,Justified,Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate.	Not Stated		No		Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and	N

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								or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a			on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be	North West Thundersley offers a strategic opportunity for sustainable growth.					soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal. • Calls for modifications to reduce pressure on Canvey and include North West Thundersley.	ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council’s approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The			fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island’s already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS’ measures								

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								Council’s removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year			routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island’s unique geography and drainage infrastructure. The island’s low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey’s ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council’s plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are								

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								housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan’s credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is			compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence								

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								sustainable, justified, and in the public interest.			base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance								

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											on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of								

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											housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the								

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											need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more								

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											suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to								

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											policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the									

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0020-0001	Individual	Lili-Marie	Benmore		Yes	C4	No	Policy C4 – West Canvey 1. Legal Compliance I do not consider the Castle Point Plan to be legally compliant for the following reasons: * Accessibility of Consultation: The consultation has not been accessible to all residents. Many people in Canvey Island do not have reliable internet access, cannot easily travel to the library, or struggle to navigate the lengthy and complex online documents. This has effectively excluded a large portion of the community from meaningful participation. This is contrary to the Council's Statement of Community Involvement (SCI), the 2012 Local Planning Regulations, and the requirements of the Equality Act 2010. * Failure to Appropriately Advertise the Appeals/Consultation Process: Information on how citizens could respond or appeal was not	No	Positive, Effective, Justified, Consistent	2. Soundness I also do not consider the plan to be sound, as required under the NPPF, for the following reasons: a) Not Positively Prepared * The Plan ignores the severe flood risk facing Canvey Island. Concentrating growth here does not positively address local needs in a safe or sustainable manner. b) Not Justified * There is no evidence that West Canvey is the most appropriate location for such a large-scale allocation. * Other, less constrained sites exist within Castle Point that would be more suitable and safer for development. * The required flood risk Sequential Test does not appear to have been applied properly. c) Not Effective * Transport: The island has only two access routes, already heavily congested. Adding more housing and industry will worsen congestion and	To make the Plan legally compliant and sound, the following modifications must be made: 1. Consultation & Accessibility * Every household on Canvey Island must receive a direct letter explaining the consultation/appeals process, with both online and paper response options (freepost return included). * Consultation materials must be available in accessible formats (large print, easy-read) and distributed at multiple venues across Canvey (community centres, GP surgeries, schools, council offices), not just one library. * Drop-in events should be held locally so residents can ask questions face to face. 2. Transport & Evacuation * A new road connection off Canvey Island must be committed to within the Plan, to relieve congestion and provide a safe evacuation route in the event of a flood or industrial	Not Stated		No		Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and	N

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								appropriately advertised. Many residents were unaware of the process or how to submit comments. The reliance on online forms excluded those without internet access, while the single alternative — accessing a paper version in the library — was unrealistic for residents with mobility issues, disabilities, caring responsibilities, or lack of transport. This approach does not meet the requirement for early, meaningful, and inclusive community engagement. * Habitats Regulations Assessment: Given West Canvey’s proximity to the Thames Estuary Special Protection Area (SPA) and Ramsar site, it is unclear whether the Habitats Regulations Assessment has properly assessed the full impacts of this scale of development. Failure to do so would render the Plan unlawful. * Flood Risk Compliance: The National Planning Policy Framework (NPPF) requires the application of the Sequential Test and Exception Test for flood risk. As Canvey Island is one of the most at-risk locations in the UK, the allocation of 500–1000 new homes here raises serious doubts that these tests			compromise emergency evacuation. * Infrastructure: No clear commitments exist for expanded healthcare, schools, emergency services, or utilities to support the additional population. * Parking: The proposed strategy to consolidate parking is unrealistic and will increase pressure on already congested residential areas. * Industrial/Commercial Expansion: Proposals to increase industrial and commercial floor space by 10% lack clear evidence of demand and risk worsening air pollution, noise, and HGV traffic. d) Not Consistent with National Policy * The plan conflicts with NPPF flood risk policies (paras 159–169), which require directing development away from high-risk areas. * It also conflicts with NPPF biodiversity policies (paras 180–182), given the proximity to protected habitats. *	accident. * Development should be conditional on this road being completed before large-scale housing or industrial expansion takes place. 3. Healthcare & Education * New housing must be supported by additional GP surgeries/doctors and at least one new primary school (with land safeguarded for a secondary school if needed). * Housing delivery must be phased alongside infrastructure provision, not left until afterwards. 4. Flood Risk Strategy * The Plan must include an updated flood risk strategy with upgraded defences, sustainable drainage, and an evacuation plan for residents. * The Sequential Test and Exception Test must be clearly evidenced and applied. 5. Parking & Local Services * Car parking standards must reflect the limited public transport available on the island. * Developer contributions (Section 106 or CIL) must be ring-fenced for services on Canvey Island (healthcare, schools, roads) rather than allocated elsewhere in the borough. 6. Biodiversity Protection * Strengthen protections for the Thames Estuary SPA/Ramsar site with buffer zones, green infrastructure,					soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal. • Calls for modifications to reduce pressure on Canvey and include North West Thundersley.	ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								have been correctly applied. The principle of sustainable development is not met, as the environmental and social harms clearly outweigh the claimed economic benefits. 3. Required Modifications 4. Conclusion For the reasons above, I request that Policy C4 – West Canvey be deleted from the Castle Point Plan unless the modifications set out are adopted.				and mitigation measures. For the reasons above, I request that Policy C4 – West Canvey be deleted from the Castle Point Plan unless the modifications set out are adopted. Without them, the Plan is not legally compliant and not sound.							

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0021-0001	Individual	Samantha	Watts		Not Stated	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a	No		Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.	Not Stated		No		Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal. • Calls for modifications to reduce pressure on Canvey and include	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability	N

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								cherished part of our landscape and heritage. They must be protected wherever possible. However,I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded ‘Blinking Owl Site’. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council’s approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation			to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government’s housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government’s impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The							North West Thundersley.	Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council’s removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers			analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island’s already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS’ measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island’s unique geography and drainage infrastructure. The island’s low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration								

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								on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The			trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West								

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								absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.			Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island’s geography								

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											and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council’s commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey’s unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better								

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											connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land								

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											provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from								

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											development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the								

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											gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip								

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											roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals.								

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											The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include								

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											North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that								

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											is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0021-0002	Individual	Samantha	Watts		Not Stated	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No				Not Stated		No		Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0022-0001	Individual	Carly	Wright		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend,	No	Positive, Effective, Justified, Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate.	Not Stated		No		Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and	N

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								or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a			on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be	North West Thundersley offers a strategic opportunity for sustainable growth.					soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal. • Calls for modifications to reduce pressure on Canvey and include North West Thundersley.	ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council’s approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The			fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island’s already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS’ measures								

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								Council’s removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year			routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island’s unique geography and drainage infrastructure. The island’s low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey’s ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council’s plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are								

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								housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan’s credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is			compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence								

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								sustainable, justified, and in the public interest.			base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance								

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											on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of								

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											housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the								

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											need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more								

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											suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to								

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											policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the									

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											Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and								

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											inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan’s soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland’s Green Belt. The Inspector								

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											found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0022-0002	Individual	Carly	Wright		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No	Not Stated			Not Stated		No		Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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0023-0001	Individual	Gina	Keble		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend,	No	Positive,Effective,Justified,Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate.	Not Stated		No	A	Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and	N

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								housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan’s credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is			compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence								

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								sustainable, justified, and in the public interest.			base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance								

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											on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of								

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											housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the								

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											need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more								

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											suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to								

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											policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the									

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											Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and								

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											inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan’s soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland’s Green Belt. The Inspector								

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											found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0023-0002	Individual	Gina	Keble		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No	Not Stated			Not Stated		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0024-0001	Individual	Kerri	Thiptorpe		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend,	No	Positive, Effective, Justified, Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate.	Not Stated		No		Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and	N

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											housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the								

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											need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more								

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											suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to								

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											policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the								

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											Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and								

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											inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan’s soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland’s Green Belt. The Inspector								

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											found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0024-0002	Individual	Kerri	Thipton		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No	Not Stated			Not Stated		No		Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0025-0001	Individual	Anita	Houser		Yes	SP3	No	I am responding as an individual resident and prefer to send my consultation response rather than complete the confusing online version. My response is in the main body of this email. I have only lived on Canvey [Redacted Personal Information] but it is quite obvious that is unable to sustain any additional building with the current infrastructure. Insurance premiums are already increased due to being a flood risk area and it will be impossible for anyone to evacuate off the Island if there is an emergency. The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful	No	Positive,Effective,Justified,Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate.	Not Stated		No	A	Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and	N

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								open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case			on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be	North West Thundersley offers a strategic opportunity for sustainable growth.					soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal. • Calls for modifications to reduce pressure on Canvey and include North West Thundersley.	ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my			fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures								

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								views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory			routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are								

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											Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and								

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											inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan’s soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland’s Green Belt. The Inspector								

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											found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0025-0002	Individual	Anita	Houser		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No	Not Stated			Not Stated		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0026-0001	Individual	Reece	Marshall		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend,	No	Positive,Effective,Justified,Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate.	Not Stated		No	A	Objects to the scale of housing proposed for Canvey Island, citing flood risk, hazardous industry proximity, and lack of emergency access. • Argues that North West Thundersley (Blinking Owl site) is a more suitable strategic growth location due to better infrastructure and lower environmental constraints. • Criticises the Plan's failure to demonstrate a deliverable five-year housing land supply, leaving Green Belt sites vulnerable to speculative development. • Challenges the	The Plan addresses flood risk, infrastructure, and development needs through INFRA policies and Policies SP3, C4, C10 and SD1, supported by the evidence base. Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and	N

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								or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a			on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be	North West Thundersley offers a strategic opportunity for sustainable growth.					soundness and legal compliance of the Plan under the NPPF, especially regarding the Duty to Cooperate and Sustainability Appraisal. • Calls for modifications to reduce pressure on Canvey and include North West Thundersley.	ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council’s approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The			fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island’s already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS’ measures								

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								Council’s removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year			routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island’s unique geography and drainage infrastructure. The island’s low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey’s ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council’s plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are								

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								housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan’s credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is			compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence								

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								sustainable, justified, and in the public interest.			base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance								

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											Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and								

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											inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan’s soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland’s Green Belt. The Inspector								

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											found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0026-0002	Individual	Reece	Marshall		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No	Not Stated			Not Stated		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0027-0001	Individual	Rebecca	Harris		Yes	SP3	No	As the Member of Parliament for Castle Point, I have always stood firmly alongside local residents in defending the character, integrity, and resilience of our Borough. The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known, and in parts of	No	Positive,Effective,Justified,Consistent	Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all of Castle Point's Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of	In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has	Not Stated		No		Objections on: • 5 Year housing supply - Not identified as required under NPPF 78. • Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution. • SA - NW Thundersley not adequately assessed. • Biodiversity - No enforceable delivery mechanisms or implementation pathways to address NPPF 180. Mitigation measure identified but theoretical rather than practical.	• Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. • Biodiversity:	N

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								Benfleet and Hadleigh, where drainage infrastructure is under strain. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council’s decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, for reasons I will detail later in this response, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded ‘Blinking Owl Site’. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without			strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest. Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing	significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth. I also encourage the Council to release a more accessible version of the consultation. Many residents have found the Regulation 19 process difficult to engage with due to its length and complexity. A more user-friendly approach would help ensure that all voices are heard. I urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate. With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough.						Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	

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								undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I would also like it to be acknowledged that, although the Council's approach to engagement has been broadly constructive and the consultations on the Plan well-advertised, many residents have found the Regulation 19 consultation difficult to engage with due to its length and complexity. It is vital that, where possible, this is made more accessible for residents, so that all voices in our community can be heard and understood. Hence why, although I have attempted to answer all the questions in the consultation, I would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by			figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the								

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								engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental and infrastructure constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act			plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not								

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								2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination.			appropriate for Canvey Island’s unique geography and drainage infrastructure. The island’s low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey’s ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council’s plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not								

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											shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence base. The Sustainability Appraisal fails to assess North West Thundersley as								

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											a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island’s geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council’s commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey’s unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. It is deeply regrettable that the Council abandoned work on the ‘Canvey Third Access Task Force’ in 2022. Had this work continued, a viable solution could have been identified and included within the Plan period. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience								

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											measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against								

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											speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may								

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											decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to								

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											and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen								

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											Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough								

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											Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages - one that								

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											protects more sensitive areas by concentrating growth where it can be properly supported. For several decades now residents across Castle Point have fought tirelessly to protect our Green Belt from inappropriate development. Time and again local people have stood together to defend fields, woodlands and open spaces that give our Borough its unique character and identity. These battles have often been long and difficult, but our communities have prevailed because the case for preservation has always been strong. The Government’s so-called “Grey Belt” is intended to capture parcels of Green Belt land that are derelict, fragmented, or of genuinely low environmental and amenity value. It was never meant to include land that is open, valued by communities, or performing the very purposes that the Green Belt is meant to serve. There is no doubt that if the Council’s draft plan is found unsound, which I believe because of the reasons outlined in my previous submission there is a very serious risk that it will be, the Inspector will direct the Council to look at what they have identified as								

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											‘Grey Belt’ sites for development to attempt to better meet local housing targets. I fear that by classifying large areas of Castle Point as “Grey Belt” the Council are inviting the Planning Inspector to do the very thing residents have fought against for decades, release treasured Green Belt for development by mislabelling it as expendable. For that reason I set out below a site-by-site rebuttal to the Council’s classifications, explaining clearly why these parcels should not be treated as Grey Belt and why each continues to merit Green Belt protection. West of Canvey Road (GB1) The Council claim the parcel lies adjacent to the urban edge and therefore makes a weaker contribution to openness¹. West of Canvey Road is essential to the integrity of Canvey Island’s landscape. Far from being derelict, it provides a critical buffer between residential areas and hazardous COMAH-designated industrial sites. The land also performs a floodplain function in a borough where surface water and tidal flooding are already major concerns. Its open aspect gives relief from urban intensity and provides resilience against								

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											climate challenges. Reclassifying such a strategically important piece of land as Grey Belt is wholly inappropriate and contrary to the NPPF's requirement to safeguard land from encroachment². East of Canvey Road (GB2) The Council's justification for classing it as 'Grey Belt' land seems to be is that it is adjacent to existing built area was and previously considered for development, therefore seen as lower value¹. This parcel is wrongly characterised. East of Canvey Road provides separation between industrial uses and residential communities. Its open nature prevents ribbon development along this strategic road and offers necessary land for drainage and flood resilience. Canvey is already over-allocated with housing in this draft plan, to designate such land as Grey Belt ignores the island's unique vulnerability and the strong evidence from Essex County Council's Section 19 Flood Report³. Land South of Charfleets (GB3) The Council's justification for classing it as 'Grey Belt' land seems to be the								

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											proximity to Charfleets industrial estate and perception of reduced “connectivity”¹. Land South of Charfleets forms a vital open break preventing sprawl from overwhelming this industrial area. Its greenery offsets industrial activity, provides amenity value and performs drainage functions. To downgrade it because of industrial adjacency is to misunderstand Green Belt policy, the NPPF explicitly highlights safeguarding the countryside from encroachment as a key purpose². Land off Glebelands (GB4) The Council’s justification for classing it as ‘Grey Belt’ land seems to be that this is one of the small peripheral parcels of Green Belt land that make less of a contribution to strategic openness¹. Glebelands is a green wedge that separates built form and protects the rural character of its surroundings. It is valued by residents for informal								

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											recreation and ecological richness. Parcel size is irrelevant, the NPPF sets no minimum thresholds and many small Green Belt sites perform critical local functions. To mark this as Grey Belt is to apply arbitrary tests not supported by national policy. I stood shoulder to shoulder with residents to fight previous attempts to develop part of this site at planning appeal stage. I am disappointed that those victories could be rendered meaningless by now designating it ‘Grey Belt’. West of Benfleet (Jotmans) (GB5) The Council’s justification for classing it as ‘Grey Belt’ land seems to be based on somewhat fragmented ownership of the whole site (although large parts are in single ownership) and adjacency to existing residential development¹. The Jotmans fields are one of the most important open landscapes in Castle Point. They prevent coalescence between Benfleet and surrounding areas, retain visual openness and									

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											support biodiversity corridors. Fragmented ownership does not diminish value, indeed it may reduce development pressure. Residents have repeatedly resisted speculative schemes here, demonstrating it's continued community importance. Just as with Glebelands, I stood shoulder to shoulder with residents to fight previous attempts to develop part of this site at planning appeal stage and then the High Court. I am disappointed that those victories could be rendered meaningless by now designating it 'Grey Belt'. Land between Felstead Road and Catherine Road (GB6) The Council's justification for classing it as 'Grey Belt' land seems to be that its irregular shape and limited access diminish its strategic contribution¹. Shape and access are not tests of Green Belt worth. This parcel prevents outward sprawl from nearby roads and maintains openness in a heavily									

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											developed part of the Borough. It also supports biodiversity and drainage in an area prone to surface water flooding. To mark it as Grey Belt is to ignore its real-world function. The Chase (GB12) The Council’s justification for classing it as ‘Grey Belt’ land seems to be that it is adjacent to residential development and the fact that has been assessed as having a lower contribution to the functions of Green Belt in SLAA¹. The Chase is an important open space separating built form and providing amenity value. It preserves the pattern of settlement and is highly visible to local residents. To release this parcel would set a precedent for creeping infill that undermines the wider Green Belt. East of Rayleigh Road (GB13)								

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											The Council’s justification for classing it as ‘Grey Belt’ land seems to be that it is on the edge of the current settlement boundary and, previously promoted for development¹. This land provides the rural setting of Rayleigh Road, preventing the blurring of urban boundaries. It supports biodiversity and acts as an accessible green corridor. Past promotion for development does not negate its current Green Belt functions. I stood with residents and the Council to fight against and win an appeal to prevent development on this site only last year. That victory should not be rendered meaningless by it being classified as ‘Grey Belt’ now. North of Grasmere Road (GB15) The Council’s justification for classing it as ‘Grey Belt’ land seems to be that it is a promoted site in SLAA and that is adjacent to and area of high housing noted¹. These open fields prevent sprawl and retain a strong									

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											settlement boundary. They also provide informal recreation for nearby residents and support biodiversity. To call this Grey Belt is to undervalue the clear openness and function it provides. East of Manor Trading Estate (NR3) The Council’s justification for classing it as ‘Grey Belt’ land seems to be that the adjacent trading estate diminishes openness¹. This parcel is a buffer between employment and housing, mitigating noise and pollution. It safeguards residents’ quality of life while preventing encroachment. Its role as a barrier to industrial creep is precisely the kind of function the Green Belt is meant to serve. Land North of Thundersley Church Road & East of Downer Road North (GB19) The Council’s justification for classing it as ‘Grey Belt’									

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											land seems to be that it is on the edge of the current settlement and land promoted through the call for sites¹. This land forms a distinct wedge of open countryside that prevents coalescence, supports biodiversity and protects Thundersley’s semi-rural setting. Its importance is recognised by residents who have fought repeated attempts to develop it. Land to the rear of 329 Benfleet Road (GB23) The Council’s justification for classing it as ‘Grey Belt’ land seems to that it is a small parcel promoted in call for sites¹. Small parcels often have high value. This one prevents ribbon development and protects neighbour amenity. It should not be downgraded merely for its size. Land off Shipwrights Close (GB24) The Council’s justification for classing it as ‘Grey Belt’ land seems to be that it is a									

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											‘gap’ site adjacent to housing¹. This parcel prevents settlement creep and maintains green relief for residents. Loss would encourage incremental erosion of the Green Belt. Land between Glen Haven and Ye Oaks, Bassenthwaite Road (GB26) The Council’s justification for classing it as ‘Grey Belt’ land seems to be that it is on the edge of a plot promoted for development¹. This site maintains the clear transition from settlement to countryside. Its openness is important locally. Downgrading it risks creeping coalescence. Land Adjacent 298 Church Road (GB27) The Council’s justification for classing it as ‘Grey Belt’ land seems to be that is was identified as a small parcel available for									

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											development in call for sites¹. This land contributes to the green setting of Church Road. Small parcels can be disproportionately important to character. Land off Glyders (GB31) The Council’s justification for classing it as ‘Grey Belt’ land seems to be that it is an edge-of-settlement parcel¹. Glyders prevents sprawl and supports biodiversity. Its downgrade is unjustified. I also believe this was also not a site featured in the regulation 18 consultation as a possible Green Belt development site. It would be unfair to local residents to consider it ‘Grey Belt’ out of the blue now. Grandview Stables, Grandview Road (GB34) The Council’s justification for classing it as ‘Grey Belt’ land seems to be that Green Belt used for									

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											equestrian purposes can be seen as less open and accessible and therefore make a lower contribution to the functions of Green Belt ¹ Grandview Stables is a classic rural land use. It preserves openness and supports recreation. It should not be downgraded. The Council's classification of these parcels as "Grey Belt" is unjustified and dangerous. None of the sites above meet the Government's suggested criteria for such a label, they are not derelict, they are not redundant, and they are not expendable. Each makes a clear and demonstrable contribution to the Green Belt purposes set out in the NPPF. By applying the "Grey Belt" label the Council are not protecting the Green Belt but putting it at risk. Should the Plan be found unsound, these will be the first sites the Inspector turns to. That is why I urge the Council to review their classifications and to give the residents who live around each site the explicit opportunity to argue against the label before the examiners are invited to reassign their fate. Most importantly, I reiterate that the Borough's housing needs cannot and should not be met by sacrificing these vital sites.								

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											A better and more balanced alternative, infrastructure-led growth at the appropriate location, namely North West Thundersley (the Blinking Owl site), is available and would protect the Borough's most treasured open spaces while also giving the Plan a realistic prospect of being found sound. I think it is profoundly wrong dishonest to not classify all or if not significantly more of the site as 'Grey Belt' when it features far more derelict, underused and plotland sites that provide little or no amenity to local residents. I urge the Council to further consult with local residents specifically around 'Grey Belt' sites who many not be aware of the significance of the label and the implications of it if the Council's plan is found flawed and unsound by the Inspector.								
0027-0002	Individual	Rebecca	Harris		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No	Not Stated			Not Stated		No		Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0028-0001	Individual	Paul	Cortwhite		Yes	Whole Plan	Yes	I support the Castle Plan Draft and feel it is 'legally compliant' and meets the test of 'soundness' , as set out in the National Planning Framework	Yes				Not Stated		No		Castle Point Plan is sound and legally compliant,	Support Noted	N
0029-0001	Individual	Johanne	Deverrick		Yes	Whole Plan	Yes	I support the Castle Plan Draft and feel it is 'legally compliant' and meets the test of 'soundness' , as set out in the National Planning Framework	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N
0030-0001	Individual	Brian	Tobin		Yes	Whole Plan	Yes	I support the Castle Plan Draft and feel it is 'legally compliant' and meets the test of 'soundness' , as set out in the National Planning Framework	Yes				Not Stated		No		Castle Point Plan is sound and legally compliant,	Support Noted	N
0031-0001	Individual	A	Tobin		Yes	Whole Plan	Yes	I support the Castle Plan Draft and feel it is 'legally compliant' and meets the test of 'soundness' , as set out in the National Planning Framework	Yes				Not Stated		No		Castle Point Plan is sound and legally compliant,	Support Noted	N
0032-0001	Individual	Steve	Lazarus		Not Stated	Whole Plan	Yes	I support the Castle Point Plan Draft and feel it is "legally compliant' and meets the test of soundness', as set out in	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N

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								the National Planning Policy Framework											
0033-0001	Individual	Linda	Sadler		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a	No	Positive,Effective,Justified,Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.	Not Stated		No	A	Objections on: • 5 Year housing supply - Not identified as required under NPPF 78. • SA - NW Thundersley not adequately assessed. • Biodiversity - No enforceable delivery mechanisms or implementation pathways to address NPPF 180. Mitigation measure identified but theoretical rather than practical. Comments on: • Concerns with infrastructure capacity and pressure to accommodate growth, particularly on Canvey. • Canvey: Concerns over flood risk. • Concerns with lack of access to the Borough, and Canvey in particular. • Green Belt: Welcome decision not to include green belt sites. • North West	• Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Infrastructure	N

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								planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan			significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West						Thundersley should have been included	matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP)). • Access to the Borough, esp. Canvey: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Comments noted.	

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								well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a			Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based								

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								considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed			systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing								

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								the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.			shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate								

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											North West Thundersley. Canvey Island’s geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council’s commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey’s unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley								

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											offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site’s residents desperately need the protection of in the face of ever-growing numbers of speculative								

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											planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most								

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											local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island								

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											but also contribute meaningfully to closing the gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local								

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											Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost								

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											and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In								

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											summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan’s soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland’s Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments,								

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											this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0033-0002	Individual	Linda	Sadler		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No	Not Stated			Not Stated		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0034-0001	Individual	Norman	Warren		Yes	SP3	Yes	Good afternoon, May I say having read the above, I feel that the council have put together a plan that the people of castle point would say was what they would accept under very difficult circumstances. The government has put so much pressure on councils with very unrealistic numbers of homes, with numbers just being plucked out of thin air, without any knowledge of the areas involved, Unfortunately they seem to be on a mission to upset many people at the moment with many policies, The plan is sound, and I thank the councillors for listening to the public opinion at meetings leading up to this time, also the planning department for their extreme effort under the most difficult pressure put on them at this time. With all that said, I think that this is a time when the councils	Yes				Not Stated		No	A	- Government housing numbers are unrealistic and plucked out of thin air, without any knowledge of the areas involved. - The plan is sound. Important to not give in to mounting pressure to avoid the start of a slippery slope. - Concerns with infrastructure, flood risk, wildlife, heritage and the threat of urban sprawl.	Support and concerns noted. - Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). - Flood risk considered in the supporting Strategic Flood Risk Assessment (SFRA). - Wildlife addressed in Policies (particularly ENV1-6) supported by a range of supporting evidence including the Habitats Regulations Assessment, Local Wildlife	N

ID Ref	Individual/Organisation/Age nt?	Firs t Na me	Last Na me	If orga nisat ion - nam e	Has agree d to publi catio n of Name /Com ment s?	Poli cy/ Par a No.	2a. Leg ally Co mp lia nt?	2b. If No, explanation	3a. So und?	3b. Positive/Eff ective/Justif ied/Consist ent?	3c. Explanation	4. Suggested modifications	5. Wi sh to par tici pat e in ex am	6. Why?	Sup porti ng Evid enc e sup plie d?	Opt ion A, B or C	Summary	Officer Response	Mods Require d		
								and public have got to be very brave and resilient, and do not give in to mounting pressure that will come without any foundation whatsoever. If we are not strong together, the outcome for the council, councillors, and residents will be the start of a slippery slope that does not end well.Everything has been said regarding the roads, One accident, gridlock. For every dwelling built, usually two cars, extra service supply for more households, water,sewage etc. Hospitals, Doctors, Schools etc, already under increasing pressure, Also flood risks in the borough, and damage to the environment. The History of Hadleigh, The Greenbelt, The farmland in around The Castle, and surrounding area, ie the Salvation Army land, is what brings people to our borough to see on their visits, with nature, wildlife, and again the history , bringing extra income to local businesses, Finally I think that turning areas of beauty and history, into urban sprawl is a disaster that can never be made right, You do not have to go too far or look elsewhere to know exactly what can happen when it is uncontested. We all need to be together and most												Site Review, South Esses Green and Blue Infrastructure Study, Essex Local Nature Recovery Strategy, Living Landscape reports, Biodiversity Report , Strategic Biodiversity Assessment. • Heritage protected by Policy D9 Conserving and Enhancing the Historic Environment	

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								resilient in this most important issue, which will affect us and our children's life forever, Thankyou, Norman Warren, and if I can add my wife Denise Warren to these comments, which she agrees with.											
0035-0001	Individual	Denise	Warren		Yes	SP3	Yes	Good afternoon, May I say having read the above, I feel that the council have put together a plan that the people of castle point would say was what they would accept under very difficult circumstances. The government has put so much pressure on councils with very unrealistic numbers of homes, with numbers just being plucked out of thin air, without any knowledge of the areas involved, Unfortunately they seem to be on a mission to upset many people at the moment with many policies, The plan is sound, and I thank the councillors for listening to the public opinion at meetings leading up to this time, also the planning department for their extreme effort under the most difficult pressure put on them at this time. With all that said, I think that this is a time when the councils and public have got to be very brave and resilient, and do not give in to mounting pressure that will come	Yes				Not Stated		No		- Government housing numbers are unrealistic and plucked out of thin air, without any knowledge of the areas involved. - The plan is sound. Important to not give in to mounting pressure to avoid the start of a slippery slope. - Concerns with infrastructure, flood risk, wildlife, heritage and the threat of urban sprawl.	Support and concerns noted. - Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). - Flood risk considered in the supporting Strategic Flood Risk Assessment (SFRA). - Wildlife addressed in Policies (particularly ENV1-6) supported by a range of supporting evidence including the Habitats Regulations Assessment, Local Wildlife Site Review, South Essex Green and Blue Infrastructure	N

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								without any foundation whatsoever. If we are not strong together, the outcome for the council, councillors, and residents will be the start of a slippery slope that does not end well.Everything has been said regarding the roads, One accident, gridlock. For every dwelling built, usually two cars, extra service supply for more households, water,sewage etc. Hospitals, Doctors, Schools etc, already under increasing pressure, Also flood risks in the borough, and damage to the environment. The History of Hadleigh, The Greenbelt, The farmland in around The Castle, and surrounding area, ie the Salvation Army land, is what brings people to our borough to see on their visits, with nature, wildlife, and again the history , bringing extra income to local businesses, Finally I think that turning areas of beauty and history, into urban sprawl is a disaster that can never be made right, You do not have to go too far or look elsewhere to know exactly what can happen when it is uncontested. We all need to be together and most resilient in this most important issue, which will affect us and our children’s life forever.											Study, Essex Local Nature Recovery Strategy, Living Landscape reports, Biodiversity Report , Strategic Biodiversity Assessment. • Heritage protected by Policy D9 Conserving and Enhancing the Historic Environment	

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								Thankyou, Norman Warren, and if I can add my wife Denise Warren to these comments, which she agrees with.											
003 6-000 1	Individual	Janet	Jones		Yes	Whole Plan	Yes	I support the Castle Plan Draft and feel it is 'legally compliant' and meets the test of 'soundness' , as set out in the National Planning Framework	Yes				Not Stated		No		Castle Point Plan is sound and legally compliant,	Support Noted	N
003 7-000 1	Individual	Neil	Jones		Yes	Whole Plan	Yes	I support the Castle Plan Draft and feel it is 'legally compliant' and meets the test of 'soundness' , as set out in the National Planning Framework	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N
003 8-000 1	Individual	Jani ce	Cramer		Yes	SP3	No	Dear Sir or Madam, I am emailing to protest against the Castle Point plan. I am a Canvey Island resident and it is ludicrous that you propose to build over 3,300 homes here. It is extremely excessive compared to Benfleet, Hadleigh and Thundersley! I understand we have to build more affordable homes in CP borough, but make it fair across the borough, not mainly all on Canvey. There are many reasons why Canvey Island is not suitable for development. * Canvey Island is a flood plain, built with dykes and soakaways. The ground is mainly clay, it is well known for surface water flooding	No	Not Stated					No	A	Disproportionate growth directed to Canvey. Canvey Island is not suitable for development. • Canvey Island is a flood plain, built with dykes and soakaways. The ground is mainly clay, it is well known for surface water flooding and is a tidal flood risk. • Current drainage systems are inadequate, our own home was flooded in the 2014 storm where drains could not cope,	Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape charact

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								and is a tidal flood risk. * Current drainage systems are inadequate, our own home was flooded in the 2014 storm where drains could not cope, hundreds of homes were damaged which took months to dry out and be repaired. There has been no upgrade to drainage since, so this could easily happen again, especially with climate change and adverse weather conditions. * There are only two roads on and off of Canvey Island, the traffic is horrendous especially weekends and rush hour. If there is an accident, breakdown or roadworks, the whole island comes to a standstill (which is a regular occurrence unfortunately.) * We have hazardous Industries on Canvey, mainly the gas terminals, if ever, God forbid there was an emergency, how would the public evacuate and how would emergency services get on the island! * Current infrastructure could not cope with 3,300 more homes - Gp's, dentists, schools, social care, transport etc. etc. Yes, Castle Point do need to build more homes, and I believe with many, many others, that there are more suitable sites that could be investigated, such as North								hundreds of homes were damaged which took months to dry out and be repaired. There has been no upgrade to drainage since, so this could easily happen again, especially with climate change and adverse weather conditions. • There are only two roads on and off of Canvey Island, the traffic is horrendous especially weekends and rush hour. If there is an accident, breakdown or roadworks, the whole island comes to a standstill (which is a regular occurrence unfortunately.) • We have hazardous Industries on Canvey, mainly the gas terminals, if ever, God forbid there was an emergency, how would the public evacuate and how would emergency services get on the island! • Current				site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan North west Thundersley was not preferred for reasons set out	er and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								West Thundersley or 'Blinking Owl Site'. I hope you listen to all our objections and reconsider this plan.									infrastructure could not cope with 3,300 more homes - Gp's, dentists, schools, social care, transport etc. etc. There are more suitable sites that could be investigated, such as North West Thundersley or 'Blinking Owl Site'. I hope you listen to all our objections and reconsider this plan.	in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Emergency Planning: Policy SD8 covers Developments near Hazardous Uses. Development proposals within the consultation zone will be assessed in accordance with the Health and Safety Executive (HSE) Guidance who may advise against development on health and safety grounds. The Council will place great weight on the	

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																		recommendation provided by the HSE. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	
0039-0001	Individual	Stephen	McQuillan		Yes	Had 4	Not Stated	Dear Castle Point Plan, I wish to object to the building of 114 homes at Had4 Land of Scrub Lane. This land, owned by Essex council, was to be developed as a new school. There is only one infants and primary school in Hadleigh, these schools are situated next to this area.	Not Stated	Not Stated		Considering the amount of homes planned in Hadleigh, 402, and the possibility of more new homes in the future, it would make more sense to build a new school on this site, where it could share the adjacent playing field. I understand the need for more homes but school places in close vicinity, walking distance, of these homes is crucial, especially as the "Plan" is to discourage the use of cars.	Not Stated		No		Objects to the building of 114 homes at Had4 Land of Scrub Lane. This land, owned by Essex council, was to be developed as a new school. There is only one infants and primary school in Hadleigh, these schools are situated next to this area. Considering the amount of homes planned in Hadleigh, 402, and the possibility of more new homes in the future, it would make more sense to build a new school on this site, where it could share the adjacent playing field. I understand the need for more	Comments noted. Current education needs have been informed by the Infrastructure Delivery Plan (IDP) and in liaison with the Education Authority at Essex County Council.	N

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																	homes but school places in close vicinity, walking distance, of these homes is crucial, especially as the "Plan" is to discourage the use of cars.		
0040-0001	Individual	Deborah	Satchell		Not Stated	Whole Plan	Yes	I'm writing to confirm my support for the Castle Point Local Plan Regulation 19. After reading the draft, I believe it is legally sound, well prepared, and in line with national planning policy. It sets out a clear approach for sustainable development across the borough. in my opinion the evidence gathered for the Plan is strong, the policies are reasonable, and the proposals are achievable within the timescales given. I think it's a balance between the need for new housing, the delivery of infrastructure, and the protection of the local environment. This should provide lasting benefits for both current residents and future generations. For these reasons, I'd like to place on record my support for the Castle Point Local Plan Regulation 19 and my view that it is legally sound	Yes	Yes			Not Stated		No	A	Supports the Plan. It is legally sound, well prepared, and in line with national planning policy. It sets out a clear approach for sustainable development across the borough. Evidence is strong, the policies are reasonable, and the proposals are achievable within the timescales given. Meets needs for new housing, the delivery of infrastructure, and the protection of the local environment.	Support noted.	N

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0041-0001	Individual	Carolyn	Blake		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a	No	Positive, effective, justified, consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.	Not Stated		No	A	A unique and tightly constrained area. Welcomes the decision not to include any of the Green Belt sites. Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. The proposed allocation of over 3,300 homes to Canvey Island is disproportionate and excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. Should also be subject to SA as a reasonable alternative.	Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. North West Thundersley has been considered, including in the Sustainability Appraisal. SA Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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								cherished part of our landscape and heritage. They must be protected wherever possible. However,I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded ‘Blinking Owl Site’. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council’s approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation			to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government’s housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government’s impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The							The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Welcome the Council’s commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey’s unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a	SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options also have been considered through the the SFRA. The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy ‘ A Better Connected Essex’ has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Canvey SuDS	Strategic Flood Risk Assessment (SFRA).

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								difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers			analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration						comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. Green Belt land provides flood attenuation, as demonstrated on	options have been considered through the Surface Water Modelling Technical Note of the SFRA.	

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								on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The			trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West						Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential.		

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								absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.			Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island’s geography								

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											and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council’s commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey’s unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better								

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											connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land								

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											provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from								

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											development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the								

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											gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip								

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											roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals.								

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											The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include								

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											North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that								

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											is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0041-0002	Individual	Caroly n	Blak e		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No	Not Stated			No t Sta ted		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0042-0001	Individual	David	Blake		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend,	No	Positive, effective, justified, consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate.	Not Stated		No	A	A unique and tightly constrained area. Welcomes the decision not to include any of the Green Belt sites. Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. The proposed allocation of over 3,300 homes to Canvey Island is disproportionate and excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. North West Thundersley offers a sustainable and strategic location for growth and	Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. North West Thundersley has been considered, including in the Sustainability Appraisal. SA Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and

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								or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a			on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be	North West Thundersley offers a strategic opportunity for sustainable growth.					should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. Should also be subject to SA as a reasonable alternative. The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. . Welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of	evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Canvey SuDS options have been considered through the Surface Water	have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council’s approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The			fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island’s already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS’ measures							its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities.	Modelling Technical Note of the SFRA.	

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								Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year			routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are						However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential.		

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								housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan’s credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is			compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence								

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								sustainable, justified, and in the public interest.			base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island’s geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council’s commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey’s unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance								

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											on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of								

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											housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the								

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											need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more								

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											suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to								

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											policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the									

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											Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and								

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											inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan’s soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland’s Green Belt. The Inspector								

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											found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0042-0002	Individual	David	Blake		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No	Not Stated			Not Stated		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0043-0001	Individual	Kiera	Blake		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend,	No		Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate.	Not Stated		No	A	A unique and tightly constrained area. Welcomes the decision not to include any of the Green Belt sites. Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. The proposed allocation of over 3,300 homes to Canvey Island is disproportionate and excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. North West Thundersley offers a sustainable and strategic location for growth and	Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. North West Thundersley has been considered, including in the Sustainability Appraisal. SA Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and

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								or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a			on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be	North West Thundersley offers a strategic opportunity for sustainable growth.					should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. Should also be subject to SA as a reasonable alternative. The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. . Welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of	evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Canvey SuDS options have been considered through the Surface Water	have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council’s approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The			fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island’s already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS’ measures							its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities.	Modelling Technical Note of the SFRA.	

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								Council's removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year			routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are						However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential.		

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								housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan’s credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is			compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence								

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								sustainable, justified, and in the public interest.			base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island’s geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council’s commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey’s unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance								

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											on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of								

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											housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the								

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											need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more								

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											suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to								

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											policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the								

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											Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and								

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											inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan’s soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland’s Green Belt. The Inspector								

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											found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0043-0002	Individual	Kiera	Blake		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No				Not Stated		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0044-0001	Individual	Sandra	Weight		Not Stated	SP3	Not Stated	I found your website on the Castle Point pre submission local plan completely un navigable. I sincerely hope that this isn't to deter people, like myself, from objecting to our local green environment and communities being destroyed by housing and the infrastructure needed to support such a project. I object most strongly to the fact that these proposed homes will not even go to local people! The chaos that such a project would cause to one of the two main arteries to and from our coast would be catastrophic for Southend, Leigh, Hadleigh, Canvey and Rayleigh. The amount of traffic the extra houses and people generate would devastate our crumbling roads and walkways. Our overcrowded, hospitals, doctors and schools would be a nightmare for all who	Not Stated	Not Stated			Not Stated		No		Object to new homes not going to local people. Concerned about impacts upon highways congestion, infrastructure, heritage (Hadleigh Castle) and foreshore	Noted. Housing needs informed by the Housing Needs Assessment, which his includes an assessment of local 'concealed' families and suppressed household formation, as well as migration trends. The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Infrastructure matters are covered by policies INFRA1-6 and the	N

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								live here. Our wonderful heritage site, Hadleigh Castle, and our foreshore would be under severe threat. As a local resident I urge you not to go forward with this awful plan. People do not want it! Our area is so much more than a government target. I trust that you will consider my comments as I believe they are shared with most of us who live here.										supporting Infrastructure Delivery Plan (IDP). The Council published a Hadleigh Farm estate Heritage Impact assessment in June 2025. Much of the District's foreshore areas are protected either as international sites or as SSSI. Impacts of development are considered in the Habitat Regulations Process (HRA).	
0045-0001	Individual	Peter	Clark		Yes	Whole Plan	Yes	Dear Sir/Madam I support the castle point plan regulation 19 draft consultation I consider the draft plan to be legally compliant I consider the draft plan to be sound	Yes				Not Stated		No		Castle Point Plan is sound and legally compliant,	Support Noted	N
0046-0001	Individual	Ian	George		Yes	Whole Plan	Yes	Dear Sir/Madam I support the castle point plan regulation 19 draft consultation I consider the draft plan to be legally compliant I consider the draft plan to be sound	Yes				Not Stated		No		Castle Point Plan is sound and legally compliant,	Support Noted	N

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0047-0001	Individual	James	Robbins		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a	No	Positive, effective, justified, consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.	Not Stated		No	A	A unique and tightly constrained area. Welcomes the decision not to include any of the Green Belt sites. Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. The proposed allocation of over 3,300 homes to Canvey Island is disproportionate and excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. Should also be subject to SA as a reasonable alternative.	Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. North West Thundersley has been considered, including in the Sustainability Appraisal. SA Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. The plan has	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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								cherished part of our landscape and heritage. They must be protected wherever possible. However,I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded ‘Blinking Owl Site’. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council’s approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation			to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government’s housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government’s impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The							The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. . Welcome the Council’s commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey’s unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a	been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy ‘ A Better Connected Essex’ has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Canvey SuDS options have been considered through the Surface Water Modelling Technical Note of the SFRA.	Strategi c Flood Risk Assess ment (SFRA).

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								difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council’s removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers			analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island’s already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS’ measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island’s unique geography and drainage infrastructure. The island’s low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration							comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. Green Belt land provides flood attenuation, as demonstrated on		

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								on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The			trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West						Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential.		

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								absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.			Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island’s geography								

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											and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council’s commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey’s unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better								

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											connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land								

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											provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from								

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											development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the								

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											gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip								

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											roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals.								

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											The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include								

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											North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that								

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											is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0047-0002	Individual	James	Robbins		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No				c		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0048-0001	Individual	Michelle	Richards		Yes	Whole Plan	Yes	Dear Sir/Madam I support the castle point plan regulation 19 draft consultation I consider the draft plan to be legally compliant I consider the draft plan to be sound	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N
0049-0001	Individual	Chris	Turner		Yes	Whole Plan	Yes	Dear Sir/Madam I support the castle point plan regulation 19 draft consultation I consider the draft plan to be legally compliant I consider the draft plan to be sound	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N
0050-0001	Individual	Wendy	Dodds		Yes	Whole Plan	Yes	Dear Sir/Madam I support the castle point plan regulation 19 draft consultation I consider the draft plan to be legally compliant I consider the draft plan to be sound	Yes				Not Stated		No		Castle Point Plan is sound and legally compliant,	Support Noted	N

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0051-0001	Individual	John	Webb		Yes	SP3	No		No	Not stated	I wish to formally object to the proposed housing development on Canvey Island, under the current draft of the Castle Point Borough Council (CPBC) Local Plan. This objection is based on both personaf and local community safety concerns, particularly the failure to properly make and apply provisions of the Civil Contingencies Act Emergency Planning Requirements Flood Risk I write as long-term residents of Canvey Island, being a survivor of the disastrous 1953 flood, I feel entitled to state that if CPBC's Regulation 19 Draft Plan proceeds without site-specific, consequence modelling in terms of flood risk, it risks repeating history under the illusion ofmodernity. A similar event today given the population growth on Canvey Island will have a much greater catastrophic outcome. Major-Hazardous Installations and Associated Port Facilities REDACTED which increases our vulnerability when faced with emergencies. Our home lies within the consultation distance of COMAH-designated hazardous sites and despite the legal obligatjons under the Control of Major		Not Stated		No	A	Objects to the proposed housing development on Canvey Island, under the current draft of the Castle Point Borough Council (CPBC) Local Plan. This objection is based on both personaf and local community safety concerns, particularly the failure to properly make and apply provisions of the Civil Contingencies Act Emergency Planning Requirements Flood Risk I write as long-term residents of Canvey Island, being a survivor of the disastrous 1953 flood, I feel entitled to state that if CPBC's Regulation 19 Draft Plan proceeds without site-specific, consequence modelling in terms of flood risk, it risks repeating history under the illusion ofmodernity. A similar event today given the population growth on Canvey Island	Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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											Accident Hazards (COMAH) Regulations and the Civil Contingencies Act (CCA), we have never received any formal communication regarding emergency planning guidance tailored to our circumstances. We are unaware of evacuation routes, shelter provisions, or how our health needs would be accommodated in the event of a major incident. The failure to warn and inform is not just a procedural oversight-it is a breach of our fundamental rights under the Human Rights Act 1998, particularly Article 2 (Right to Life) and Article 8 (Right to Private and Family Life). Hazard Range Consequence. We are acutely aware that emergency planning fails to provide for the known consequence identified via the Safety Reports of the Oikos and Calor Gas Installations. The ramification of which are not remotely accounted for in terms of human harm, how badly and how many are living and working within the Hazard Range. Vulnerable Communities We are deeply concerned that: Specific emergency plans are generally not known amongst the community. Many of which reside in Park						will have a much greater catastrophic outcome.		

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											Home retirement dwellings, being completely inappropriate for situations of serious flooding or industrial accidents. Failure to provide public information under COMAH Regulation or the CCA's duty to warn and inform is of huge concern. The vulnerabilities of a young and aging community have been ignored in all local resilience planning, despite clear statutory duty obligations. Conclusion Whilst the Castle Point Plan 2026-2043 does acknowledge flood risk and the presence of major industrial hazards- especially on Canvey Island-it arguably falls short of fully articulating how increased population density could amplify the consequences of such risks. We urge the Planning Inspector to consider whether this plan is truly "sound" or "legally compliant" when it fails to integrate consequence-based emergency planning compounded by access and egress issues. The plan omits viable alternative sites outside of Flood Zone 3 and COMAH Site Hazard Range whilst actively selecting its primary								

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											housing site in the already urbanised at risk environment of Canvey Island.								
005 2-000 1	Individual	Graham	Dodds		Yes	Whole Plan	Yes	I support the Castle Point Plan Regulation 19 Draft Consultation I consider the draft plan to be legally compliant I consider the draft plan to be sound	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N
005 3-000 1	Individual	Christine	Peters		Yes	Whole Plan	Yes	I support the Castle Point Plan Regulation 19 Draft Consultation. I consider the draft to be legally compliant. I consider the draft plan to be sound.	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N
005 4-000 1	Individual	J	Curtis		Not Stated	SP3	Not Stated	To whom this May concern, I have always been concerned regarding the propose building of houses on Jotman farm, And have attended meetings at the town hall Castlepoint and attended	Not Stated	Not stated			Not Stated		No		Concerned by proposed building of houses on Jotman farm, concerns regarding the infrastructure and the traffic	Noted. Infratsructure matters addressed by INFRA policies, Highways and access matters addressed by	N

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								demonstrations and written emails . i still feel the same concerns regarding the infrastructure the traffic road preparations we have more than enough traffic comes through our roads as it is i wish to vote against the proposal of houses being built.										Promoting Sustainable Transport.	
0055-0001	Individual	Lyn da	Web b		Yes	Whole Plan	Yes	Dear Sir/Madam I support the Castle Point Plan Regulation 19 Draft Consultation I consider the draft plan to be legally compliant I consider the draft plan to be sound I consent to my full name being published alongside my comments for this consultation. I feel the need to keep our green belt/grey belt essential. Please do not destroy these areas that are beneficial to the health of our community and to wildlife alike. Thank you for reading this plea.	Yes				Not Stated		No	A	Supports the Plan Draft and feel it is 'legally compliant' and 'sound'. I feel the need to keep our green belt/grey belt essential. Please do not destroy these areas that are beneficial to the health of our community and to wildlife alike.	Support noted.	N

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0056-0001	Individual	Linda	Norton		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a	No	Positive, Effective, Justified, Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.	Not Stated		No		A unique and tightly constrained area. Welcomes the decision not to include any of the Green Belt sites, protecting a cherished part of our landscape and heritage. Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. The proposed allocation of over 3,300 homes to Canvey Island is disproportionate and excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. Lack of access in and out of the Borough, only three routes. Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution. North West Thundersley offers	Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. North West Thundersley: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Housing Supply: See housing topic paper. Plan	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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								cherished part of our landscape and heritage. They must be protected wherever possible. However,I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded ‘Blinking Owl Site’. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council’s approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation			to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government’s housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government’s impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The						a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. Should also be subject to more in depth SA as a reasonable alternative. The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. . Welcome the Council’s commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey’s unique drainage context. The slow release of retained water can have negative cumulative effects if not properly	to provide for rolling 5 year housing land supply. Hazardous Industries: Policy SD8 covers Development near Hazardous Uses. Development proposals will be assessed in accordance with the Health and Safety Executive (HSE) Guidance where they fall within a consultation zone for one or more hazardous installations. Where the HSE advises against development the planning application will be refused on health and safety grounds. Canvey SuDs cobvered in policy and SFRA but furthermod proposed. Canvey Access: The plan has been subject to detailed Transport Assessment, including	Strategic Flood Risk Assessment (SFRA).

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								difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council’s removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers			analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island’s already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS’ measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island’s unique geography and drainage infrastructure. The island’s low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration						accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. Castle Point Borough Council deserves credit for adopting a brownfield-first	Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy ‘ A Better Connected Essex’ has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan	

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								on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The			trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West						approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential.		

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								absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.			Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island’s geography								

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											and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better								

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											connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land								

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											provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from								

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											development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the								

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											gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip								

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											roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals.								

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											The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include								

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											North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that								

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											is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0056-0002	Individual	Linda	Norton		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No				Not Stated		No		Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point’s case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0726-0001	Organisation	Nicholas	Martin	ACHES	Yes	Whole Plan	Yes		Yes				Yes	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0334-0001	Organisation	Gleann	Smith	ACT Roadways ltd		B8	No	This submission is by and on behalf of A.C.T Roadways Ltd who are the title owners of HMLR EX590021 which encompasses the whole of the Private Road & Path network on the Manor Trading Estate. Benfleet Essex. Significantly The Manor Trading Estate (MTE) is the only significant industrial / commercial space within Benfleet, it is the 2nd biggest designated employment area in within Castle Point. When I suggest 2nd that excludes CPBC themselves. They have a significant workforce that is financially support by the business rates collected from the business throughout castle point, of which 50% is retained by CPBC!	No		There are many significant anomalies surrounding the plan and or information relayed in the reg 19 document and the meeting notes. I highlight below just some those anomalies 1. Castle Point have a business forum it located via this link Castle Point Business Forum CastlePoint The attached snapshots are from the Business Forum & Bussiness Support & regeneration page drawn down 23/09/25 @13.56 Hrs Castle Point Business Forum The Castle Point Business Forum is currently inactive. However, we are looking to relaunch this forum in 2024. If you would like to become a part of this forum shaping its new direction, please email us at			Yes - see attachment	B - see 0334 - 003	<u>Manor Trading Estate</u> Object to both the policy (particularly partail replavement with residential) and the level of engagement to inform it.	<u>Manor Trading Estate</u> Noted Manor Trading Estate is included within Policy E1 which includes the statement ' the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other ‘sui generis’ uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	N	

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								We consider the Castle Point Plan Regulation 19 Draft is NOT compliant, is therefore Unsound, legally or otherwise. CPBC have numerous documents which clearly indicate they have misled the residents of Castle Point! They have informed all in Castle Point that they have engaged with the business that drive and invest in the local economy providing much needed new business premises and local employment opportunities. This Regulation 19 document has relayed to the residents of Castle Point that we the business’s in Castle Point agree with the plan! Further that not only do we agree with it. CPBC have significantly informed everyone that we were involved in its development! That we also relayed our views to them, and that the officers and councillors alike at Castle Point took our views and opinions on board, which culminated in this draft local plan. That is totally NOT TRUE perhaps same officers & councillors might produce those supporting documents? As with all local plans the driver behind a local plan is the economy. The economy			business@castlepoint.gov.uk • So much for engaging with business. The dates above indicate that last available date the forum was available would have been at best 31st Dec 2023. How long have the officers been developing this plan? Business Support and Regeneration Our Economic Development and Regeneration Team is responsible for developing and delivering business support and regeneration projects to support improvements within the Borough that help to make the area a better place to live and work. • CPBC have a team? Perhaps had they made contact whilst this plan was in process they might have truly reflected the opinions of the business community. Further significant anomalies – indicate a complete and utter disregard and misrepresentation to all residents and the local business community								

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								is driven by investment, 95% of investment comes from private business. Unlike most local authorities CPBC do not appear to have an adopted Regeneration & Economic Growth Strategy. Although CPBC do have a dedicated councillor who holds and has held the post / title of “Cabinet Member” recently re-titled “Portfolio Holder” responsible for Yes you guessed it “Regeneration & Economic Growth” since 2023. As previously stated, it is FACT not hearsay that I / We the private Road network owner at the MTE have never ever had a conversation, an email from that individual, Nor CPBC supposed regeneration team. Nor any officer who may have been involved in the drafting this unsound plan. Although I did email the cabinet member responsible for Regeneration & Economic Growth along with other committee member a concise document prior the committee meeting which identified the many anomalies contained in the draft. Which not unsurprisingly he along with other committee members totally ignored. The culmination of that meeting was a unanimous vote for											

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								this regulation 19 public consultation. For the Avoidance of doubt that same information was relayed to 2 other councillors on that 7-person committee who happened to be 2 of the 3 MTE's Ward Councillors. None had the decency to reply let alone acknowledge the serious concerns relayed to them. So much for engaging with local business It is fact that no Officer, Councillor nor the specialist outside business consultant engaged by CPBC "Deyton Bell, have never ever engaged with A.C.T Roadways Ltd. The following is taken from CPBC website! Castle Point Council has partnered with Deyton Bell Ltd to deliver a fully funded business support program under the UK Shared Prosperity Fund (UKSPF), which is designed to support entrepreneurs and existing businesses within the Castle Point borough Suffice any new plan is supposedly supported by auditable evidence. Perhaps CPBC might locate all and every business engagement Q&A they received.											

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0058-0001	Individual	Erik	Richards on		Yes	Whole Plan	Yes	I support the Castle Point Plan Regulation 19 Draft Consultation I consider the draft plan legally compliant I consider the draft plan to be sound I consent to my full name being published alongside my comments for this consultation	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N
0059-0001	Individual	Steve	McGregor		Not Stated	C5	Not Stated	A restricted tunnel for cars, pedestrians and cyclists would not only provide a needed 3rd access but also open up employment opportunities in Thurrock to Canvey residents. This could also contribute to the soundness of policy C4. The Thames enterprise park would be 2.3 miles, 10-15 minutes bike ride away. A smaller tunnel would be quicker and cheaper to construct with precast sections as an example that will minimise length of time work is undertaken in the SSSI. Once completed the marsh can be reinstated with no need for mitigation. Kind regards Steve	Not Stated				Not Stated		Yes additional information regarding access plans off Canvey	A	Policy C5 A restricted tunnel for cars, pedestrians and cyclists would not only provide a needed 3rd access but also open up employment opportunities in Thurrock to Canvey residents. This could also contribute to the soundness of policy C4. The Thames enterprise park would be 2.3 miles, 10-15 minutes bike ride away. A smaller tunnel would be quicker and cheaper to construct with precast sections as an example that will minimise length of time work is undertaken in the SSSI. Once completed the marsh can be	Comments noted. Submission papers saved to internal folder 'Canvey Access Feasibility Study (Forthcoming)' for further consideration as part of the future project.	N

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																	reinstated with no need for mitigation.		
0060-0001	Individual	Neil	Scarff		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory	No	Positive,Effective,Justified,Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.	Not Stated		No	A	Objections on: • 5 Year housing supply - Not identified as required under NPPF 78. • Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution. • SA - NW Thundersley not adequately assessed. • Biodiversity - No enforceable delivery mechanisms or implementation pathways to address NPPF 180. Mitigation measure identified but theoretical rather than practical. • Canvey: Concerns over flood risk. SUDS must be designed with a full understanding of Canvey's unique drainage context.	• Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design

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								for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However,I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded ‘Blinking Owl Site’. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the			Government’s target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government’s housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government’s impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines							• Green Belt: Welcome decision not to include green belt sites. • North West Thundersley should have been included.	transport evidence. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options also have been considered through the the SFRA. Comments noted.	Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								Council’s approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council’s removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic			the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island’s already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS’ measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island’s unique geography and drainage infrastructure. The island’s low elevation,								

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								location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not			high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local								

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								provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.			constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of								

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											the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island’s geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council’s commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey’s unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village								

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											area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt								

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											site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may								

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											decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to								

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											and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen								

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											Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough								

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											Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that								

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											protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan’s soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland’s Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a								

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											Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0060-0002	Individual	Neil	Scarff		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No	Not Stated			Not Stated		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0061-0001	Individual	Colin	Duff		Not Stated	SP3	No	Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory	No	Positive,Effective,Justified,Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate.	Not Stated		No	A	Objections on: • 5 Year housing supply - Not identified as required under NPPF 78. • Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution. • SA - NW Thundersley not adequately assessed. • Biodiversity - No enforceable delivery mechanisms or implementation pathways to address NPPF 180. Mitigation measure identified but theoretical rather than practical. • Canvey:	• Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and

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								for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the			on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be	North West Thundersley offers a strategic opportunity for sustainable growth.					Concerns over flood risk. SUDS must be designed with a full understanding of Canvey's unique drainage context. • Green Belt: Welcome decision not to include green belt sites. • North West Thundersley should have been included.	currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options also have been considered through the the	have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								Council’s approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council’s removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic			fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island’s already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS’ measures								SFRA. Comments noted.	

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								location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not			routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are								

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								provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.			compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence								

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											base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island’s geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council’s commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey’s unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance								

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											on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of								

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											housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the								

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											need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more								

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											suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to								

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											policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the									

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											Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and								

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0061-0002	Individual	Colin	Duff		Not Stated	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No	Not Stated			Not Stated		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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0062-0001	Individual	Matthew	Watson		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend,	No	Positive,Effective,Justified,Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate.	Not Stated		No	A	Objections on: • 5 Year housing supply - Not identified as required under NPPF 78. • Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution. • SA - NW Thundersley not adequately assessed. • Biodiversity - No enforceable delivery mechanisms or implementation pathways to address NPPF 180. Mitigation measure identified but theoretical rather than practical. • Canvey:	• Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and

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								significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council’s approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The			fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island’s already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS’ measures											through the the SFRA.	

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								Council’s removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year			routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island’s unique geography and drainage infrastructure. The island’s low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey’s ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council’s plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are								

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								housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan’s credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is			compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence								

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								sustainable, justified, and in the public interest.			base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island’s geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council’s commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey’s unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance								

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											on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of								

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											housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the								

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											need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more								

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											suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to								

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											policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the									

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											Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and								

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											inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan’s soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland’s Green Belt. The Inspector								

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											found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0062-0002	Individual	Matthew	Watson		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No	Not Stated			Not Stated		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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0063-0001	Individual	Roslyn	Watson		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend,	No	Positive,Effective,Justified,Consistent	Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate.	Not Stated		No	A	Objections on: • 5 Year housing supply - Not identified as required under NPPF 78. • Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution. • SA - NW Thundersley not adequately assessed. • Biodiversity - No enforceable delivery mechanisms or implementation pathways to address NPPF 180. Mitigation measure identified but theoretical rather than practical. • Canvey:	• Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and

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								or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a			on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be	North West Thundersley offers a strategic opportunity for sustainable growth.					Concerns over flood risk. SUDS must be designed with a full understanding of Canvey's unique drainage context. • Green Belt: Welcome decision not to include green belt sites. • North West Thundersley should have been included.	currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options also have been considered through the the	have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council’s approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The			fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island’s already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS’ measures								SFRA. Comments noted. • Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	

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								Council’s removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year			routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island’s unique geography and drainage infrastructure. The island’s low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey’s ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council’s plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are								

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								housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan’s credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is			compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence								

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								sustainable, justified, and in the public interest.			base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance								

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											on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of								

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											housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the								

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											need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more								

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											suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to								

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											policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the								

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											Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and								

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											inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan’s soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland’s Green Belt. The Inspector								

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											found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0063-0002	Individual	Roslyn	Watson		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No	Not Stated			Not Stated		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0064-0001	Individual	Juliet	Clark		Yes	Whole Plan	Yes	Dear Sir/ Madam , I support the Castle Point plan regulation 19 Draft Consultation. I consider the draft plan to be legally compliant. . I consider the draft plan to be sound .	Yes				Not Stated		No		Castle Point Plan is sound and legally compliant,	Support Noted	N
0065-0001	Individual	Karen	Mills		Yes	Whole Plan	Yes	Dear Sir/ Madam , I support the Castle Point plan regulation 19 Draft Consultation. I consider the draft plan to be legally compliant. . I consider the draft plan to be sound .	Yes				Not Stated		No		Castle Point Plan is sound and legally compliant,	Support Noted	N
0066-0001	Individual	Julian	Strauss		Yes	Whole Plan	Yes	Dear Sir/ Madam , I support the Castle Point plan regulation 19 Draft Consultation. I consider the draft plan to be legally compliant. . I consider the draft plan to be sound .	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N
0067-0001	Individual	Maureen	Pearce		Not Stated	SP3	No	I agree with Dame Rebecca Harris's reply to you I consider the Castlepoint Plan regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. . The plan needs amending,	No	Consistent with National Policy	It not consistent with national policy, it doesn't meet the housing target for Castlepoint, and the site ignores Greenbelt/Greybelt against new NPPF guidelines.	Adding the North West Thundersley site as an alternative gives us the housing numbers required, we can then reduce the over development of our urban sites. Considering NW Thundersley will give a housing target of 11000.	No		Yes, Dame Rebecca Harris' consultat		I consider the Castlepoint Plan regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy.	Comments noted. Grey belt covered under policy GB2. Infrastructure matters are covered by policies INFRA1-	N

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								current plan allows for the over development of Castlepoint especially Canvey Island, there is a lack of infrastructure, sewerage and drainage, along with flooding implications. Note, I do not wish to participate at the oral submission.							ion response		It not consistent with national policy, it doesn't meet the housing target for Castlepoint, and the site ignores Greenbelt/Greybelt against new NPPF guidelines. The plan needs amending, current plan allows for the over development of Castlepoint especially Canvey Island, there is a lack of infrastructure, sewerage and drainage, along with flooding implications. Adding the North West Thundersley site as an alternative gives us the housing numbers required, we can then reduce the over development of our urban sites. Considering NW Thundersley will give a housing target of 11000.	6 and the supporting Infrastructure Delivery Plan (IDP). Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA).	
0068-0001	Individual	Maura	Bell		Not Stated	SP3	No	I agree with Dame Rebecca Harris's reply to you I consider the Castlepoint Plan regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent	No	Consistent with National Policy	It not consistent with national policy, it doesn't meet the housing target for Castlepoint, and the site ignores Greenbelt/Greybelt against new NPPF guidelines.	Adding the North West Thundersley site as an alternative gives us the housing numbers required, we can then reduce the over development of our urban sites. Considering NW	No		No		I consider the Castlepoint Plan regulation 19 Draft to be unsound. It fails the tests of soundness for justified and	Comments noted. Grey belt covered under policy GB2. Infrastructure matters are	N

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								with national policy. . The plan needs amending, current plan allows for the over development of Castlepoint especially Canvey Island, there is a lack of infrastructure, sewerage and drainage, along with flooding implications.				Thundersley will give a housing target of 11000.					consistent with national policy. It not consistent with national policy, it doesn't meet the housing target for Castlepoint, and the site ignores Greenbelt/Greybelt against new NPPF guidelines. The plan needs amending, current plan allows for the over development of Castlepoint especially Canvey Island, there is a lack of infrastructure, sewerage and drainage, along with flooding implications. Adding the North West Thundersley site as an alternative gives us the housing numbers required, we can then reduce the over development of our urban sites. Considering NW Thundersley will give a housing target of 11000.	covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA).	

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0069-0001	Individual	Elaine	Barber		Not Stated	SP3	No	I object to the Castlepoint plan. There are far too many properties on Canvey Island already. There is not enough access to leave the Island in an emergency.	No	Justified, consistent with national policy	I consider the Castlepoint Plan regulation 19 to be unsound. It fails the tests if soundness for justified and consistent with national policy. It does not meet the housing target for Castlepoint and the site ignores Greenbelt/Greybelt against new NPPF guidelines. The plan allows for over development of Castlepoint especially Canvey where there is a lack of infrastructure, sewerage and drainage along with flooding implications.	Adding the North West Thundersley site as an alternative gives us the housing numbers required we can reduce the over development of our urban sites. Considering NW Thundersley will give a housing target of 11000.	No		No		I consider the Castlepoint Plan regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It not consistent with national policy, it doesn't meet the housing target for Castlepoint, and the site ignores Greenbelt/Greybelt against new NPPF guidelines. There are far too many properties on Canvey Island already. There is not enough access to leave the Island in an emergency. The plan allows for over development of Castlepoint especially Canvey where there is a lack of infrastructure, sewerage and drainage along with flooding implications. Adding the North West Thundersley site as an alternative gives us the housing numbers required we can reduce the	Comments noted. Grey belt covered under policy GB2. Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA).	N

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																	over development of our urban sites. Considering NW Thundersley will give a housing target of 11000.		
0070-0001	Individual	Frances	Adams		Not Stated	SP3	No	To whom it may concern, I would like it to be known that as a resident of Canvey for [REDACTED], I strongly object to the proposed Regulation 19 plan involving further development on the Island. I have read Dame Rebecca Harris' email to you regarding the said plan. I agree wholeheartedly with everything she has said in respons	No	Justified, consistent with national policy	e. I consider the plan to be unsound. It fails the tests of soundness for justified and consistence with national policy. It does not meet the housing target for CastlePoint, and the site ignores Greenbelt/Greybelt against NPPF guidelines. The plan needs amending, the current plan allows for the overdevelopment of CastlePoint especially Canvey, there is a lack of infrastructure, sewerage and drainage, along with flooding implications.	Adding the North West Thundersley site as an alternative gives us the housing numbers required, we can then reduce the overdevelopment of our urban sites. in fact , considering the NW Thundersley site will give a housing target of 11000.	No		No		I consider the Castlepoint Plan regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It not consistent with national policy, it doesn't meet the housing target for Castlepoint, and the site ignores Greenbelt/Greybelt against new NPPF guidelines. There are far too many properties on Canvey Island already. There is not enough access to leave the Island in an emergency. The plan allows for over development of Castlepoint especially Canvey where there is a lack of infrastructure, sewerage and drainage along with flooding implications. Adding the North	Comments noted. Grey belt covered under policy GB2. Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy ' A Better Connected	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																	West Thundersley site as an alternative gives us the housing numbers required we can reduce the over development of our urban sites. Considering NW Thundersley will give a housing target of 11000.	Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan	
0071-0001	Individual	Dawn	Artley		Not Stated	SP3	No	I consider the Castlepoint Plan regulation 19 Draft to be unsound	No	Justified, consistent with national policy	It fails the tests of soundness for justified and consistent with national policy. It not consistent with national policy, it doesn't meet the housing target for Castlepoint, and the site ignores Greenbelt/Greybelt against new NPPF guidelines.	The plan needs amending, current plan allows for the over development of Castlepoint especially Canvey Island, there is a lack of infrastructure, sewerage and drainage, along with flooding implications. Adding the North West Thundersley site as an alternative gives us the housing numbers required, we can then reduce the over development of our urban sites. Considering NW Thundersley will give a housing target of 11000.	No		No	A	I consider the Castlepoint Plan regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It not consistent with national policy, it doesn't meet the housing target for Castlepoint, and the site ignores Greenbelt/Greybelt against new NPPF guidelines. The plan needs amending, current plan allows for the over development of Castlepoint especially Canvey Island, there is a lack of infrastructure, sewerage and drainage, along with flooding implications.	Comments noted. Grey belt covered under policy GB2. Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending	N

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																	Adding the North West Thundersley site as an alternative gives us the housing numbers required, we can then reduce the over development of our urban sites. Considering NW Thundersley will give a housing target of 11000.	interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan	
0072-0001	Individual	Helen	Davis		Yes	SP3	No	I DO NOT consider the draft plan to be legally compliant. Reason: Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding.	PROPOSED MODIFICATIONS: Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. I consent to my full name being published alongside my comments for this consultation.	Not Stated		No		Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The	Grey belt covered under policy GB2. SLAA and Sa considered all reasonable site options. North-West Thundersley: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley.	transport evidence.	
0072-0002	Individual	Hel en	Davi s		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Justified, consistent with national policy			No t Sta ted		No		Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0073-0001	Individual	Joe	Davi s		Yes	SP3	No	I DO NOT consider the draft plan to be legally compliant. Reason: Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based	PROPOSED MODIFICATIONS: Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. I consent to my full name being published alongside my comments for this consultation.	No t Sta ted		No		Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. The draft local plan is not justified and consistent with national policy. It doesn't meet	Grey belt covered under policy GB2. SLAA and Sa considered all reasonable site options. North-West Thundersley: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											on the 'over development of Brownfield sites'. Not all sites have been considered, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley.	(also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence.	
0073-0002	Individual	Joe	Davis		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Justified, consistent with national policy			Not Stated		No		Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0074-0001	Individual	Robert	Sharp		Yes	SP3	Not Stated	The citizens of Castle Point are concerned that the thought of introducing further housing without addressing the existing major road congestion would be intolerable. As I am sure you know, unacceptable traffic congestion already occurs every morning and evening in Benfleet, Canvey & Hadleigh. This will only get worst with the housing expansion already planned for Southend and Shoebury as the only access is via CastlePoint. Every new house tends to add two car. You state that 'delivery of development accords with the needs of the area', exactly, and more housing is not a demand for the residents in CP. This plan is better than the previous Council's Plan but there are still a number of issues I wish to raise after attending one of your meetings. 1) Currently Castle Point is already log-jammed with traffic congestion both mornings and evenings and access is intolerable. Problem has grown recently due to two reasons a) Recent increase in number of two car households within the borough and b) Recent new housing estates built in Shoebury & Southend who have to access Castle Point	No	Not Stated	Therefore the plan currently fails on Soundless grounds as adequate access via roads to proposed new sites is impossible. Can you arrange for the department who will construct the new roads to advise residence accordingly and include these in your plan. A meaningful plan should include new access roads together with how increase demand to doctors, schools and other essentials needed by a larger population are to be achieved. I recognise the Government's pressure on you to expand [REDACTED Innapropriate Language]	Action should be taken as follows: 1) Before any new housing estates are even considered, new access roads need to be built in Benfleet, Hadleigh & Canvey 2) This may be possible from Canvey by a road to link with further up the A13 at Fobbing thus easing Canvey Way/A13 junction. Also possibly a link direct to Leigh for access to Southend. 3) More difficult however, is adding new access roads in South Benfleet and Hadleigh. The area is already congested with housing which proves our concern, we cannot build any more major housing except maybe the odd fill ins. 4) This suggests more housing would be impractical for traffic reasons, in addition to increase in demand for doctors, schools and other essential services. Suggestion, a) new road directly from Canvey to Leigh and b) new road east of Canvey to Fobbing area on A13. Both will ease CP.	Not Stated		No	A	The Plan currently fails on Soundless grounds as adequate access via roads to proposed new sites is impossible. 1) Currently Castle Point is already log-jammed with traffic congestion both mornings and evenings and access is intolerable. Problem has grown recently due to two reasons a) Recent increase in number of two car households within the borough and b) Recent new housing estates built in Shoebury & Southend who have to access Castle Point when traveling by car. 2) Your plan proposes even building more houses in Benfleet and Canvey but does not include any new access roads. This will make the traffic jams even worse. You advise that its not the Council's responsibility to plan new access roads, it for another	The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sounded?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
								when traveling by car. 2) Your plan proposes even building more houses in Benfleet and Canvey but does not include any new access roads. This will make the traffic jams even worse. You advise that its not the Council's responsibility to plan new access roads, it for another department. Therefore your current plan is unsustainable as published. 3) New access roads are a must if new houses are to be built. However, constructing new access roads in Benfleet is infeasible unless you tear down some houses to make space - defeating the object of more homes! It is possible to construct new roads off Canvey away from Castle Point.									department. Therefore your current plan is unsustainable as published. 3) New access roads are a must if new houses are to be built. However, constructing new access roads in Benfleet is infeasible unless you tear down some houses to make space - defeating the object of more homes! It is possible to construct new roads off Canvey away from Castle Point. Suggestion, a) new road directly from Canvey to Leigh and b) new road east of Canvey to Fobbing area on A13. Both will ease CP. I recognise the Government's pressure on you to expand but why do we need more housing.		
0075-0001	Individual	Olive	Campe		Not Stated	Had 4	Not Stated	Dear Castle Point Council I object to the planned housing in this plan, it's a nightmare driving past the said area due to parked cars even when the school is closed. At times the	Not Stated	Not stated	It's just too many houses etc, even if sizes of boxes it still means more cars per house to park, two space allocation per property is not enough.	I'm sure that great open space would benefit the attached school so much more, give the local children an open space to actually run and play instead of taking spaces/views away.	Not Stated		No		I object to the planned housing in this plan, it's a nightmare driving past the said area due to parked cars even when the	Comments noted.	N

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								traffic is stationary trying to get through, a special danger for emergency services.				How the local people will appreciate you then. Give something back instead of taking.					school is closed. At times the traffic is stationary trying to get through, a special danger for emergency services. It's just too many houses etc, even if sizes of boxes it still means more cars per house to park, two space allocation per property is not enough. I'm sure that great open space would benefit the attached school so much more, give the local children an open space to actually run and play instead of taking spaces/views away.		
0076-0001	Individual	Tania	Sitc h		Yes	Whole Plan	Yes	Dear Sir/Madam I support the Castle Point Plan Regulation 19 Draft Consultation I consider the draft plan to be legally compliant I consider the draft plan to be sound	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N
0077-0001	Individual	Geoff	Blackledge		Yes	Whole Plan	Yes	I support the Castle Point Plan Regulation 19 Draft Consultation. I consider the plan achieves a good balance for future sustainable growth and that the draft plan is both legally compliant and sound.	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N

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0334-0002	Organisation	Gle nn	Smit h	ACT Road ways ltd		E1	No	Key priorities: Employment, Innovation and Economic Development • Canvey Seafront - to attract commercial investment and enhance the seafront appearance/facilities, creating more jobs for local people and improving the leisure and recreational opportunities for local people and visitors. • Northwick Road - Canvey - To attract investment into the area and create high quality jobs for local people. • Charfleets Industrial Estate - Canvey - To improve access on to the estate and extend the estate. • Manor Trading Estate, Benfleet - Redevelopment of the trading estate for residential purposes and the relocation of the existing uses to a new site in the north of the Borough. • Opps the 4th priority, says, the MTE will be redeveloped for new housing! • With us the businesses on the MTE relocating to the North! • The site they suggest as “North” is commonly referred to by CPBC as GB16! • Discussions & public meetings during Aug & Sept 24 this GB16 parcel was the	No		Further anomalies. CPBC have made some significant errors in this envisaged plan which contradict its own documents. 1st They suggest that the MTE is 14.5 Hectare its only 12.5 at best. That’s fact 2nd They indicate in one document that the West Side of the MTE commercial properties (circa 3.4 Ha - 25% of the estate) is to go being replaced with 200 residential units. One presumes they are using a multiplier of 50 to 55 per Ha, based on that density they will be Apartments and not houses with gardens and amenity space. 3rd Where might those new residents work! 4th CPBC then totally contradict themselves. They have produced another document that indicates the whole of the manor trading estate is to be replaced with housing. Not just the western side! BUT significantly they still suggest only 200 residential units. Simple calculation if we reflect that CPBC officers say the MTE is 14.5 Ha that’s a density of 13.7 residential units per hectare not very good return for decimating the local economy. Perhaps the idea is to attract new residents to the area that are wealthy.			Yes - see attachment	B - see 0334 - 003	Concern for the businesses currently operating within the borough and where they will go due to the proposed mixed use sites allocated.	Noted Manor Trading Estate is included within Policy E1 which includes the statement ' the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other ‘sui generis’ uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	N	

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								obvious answer to economic regeneration in terms of business expansion, & investment along with significant new circa 5000+ affordable housing under grey belt scenarios. - Using the GB16 parcel would have delivered significant infrastructure investment & improvements to the local road network. It would have relieved severe congestion into and around Benfleet particularly at Sadlers Farm, The Tarpots and the local residential Church Road neighbourhood. Whilst doing so the GB16 parcel would have allowed all residents in residential areas of Thundersley Old or new to be able to access the local housing road networks without using the 3 severely congested area noted above. - CPBC after putting this local plan forward for public consultation in July 25, produced a green belt review in August, which justified why that GB16 plot was not a viable option to include in the Local plan. One wonders why this wasn't produced and presented prior to the committee voting unanimously to take this to public consultation. - Yet at this day whilst			Perhaps the aim is to develop mini mansions with a buying price of circa £1.5M. they would be considered truly affordable for the local community. 5th No one has informed anyone on the trading estate where we are going to be rehoused. 6th It appears that CPBC think it's OK to dictate that all the business's on the MTE, should up sticks & move to Canvey which is neither accessible nor affordable. This is the same Canvey that has one single carriageway in & out that has significant traffic congestion daily. 7th The effect this plan will have on the local economy will be devastating to existing business's or anyone who might want to invest in a local business. This plan will drive business away from Castle Point to a more supportive local council. Fact Basildon, Rochford Southend & Thurrock support local business and encourage new business. 8th For CPBC to even suggest that they will be decimating the local business perhaps they might put a figure on the purchase of the Private Road Network. In doing so take on the legal responsibilities that come								

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								writing this objection 23rd Sept 2025 the same council still informs anyone who might consider investing in new business, or indeed anyone already here investing in improvements Should not bother! Why would anyone invest in a business new or old where the local council says its being demolished and replaced by housing. • Who will be funding the business move, who will value a redundant property value, who will support the enormous cost of moving the business’s • Where might the Businesses on the MTE be relocate too.			with the deeds of grants and covenants that go with the title. 9th Suffice any plan to redevelop the MTE will come at a premium. A.C.T Roadways Ltd do not consider the Castle Point Plan Regulation 19 Draft to be Sound. It fails the tests of soundness on the business front alone. Again, business is the life blood of any local plan. CPBC officers have not engaged with the 120 businesses on MTE. I have engaged with them. Suffice the great majority have not only engaged with me & A.C.T they have more importantly willingly contributed significant sums of money which has allowed us as a business community to execute significant improvements to the estate. those improvements have had a desired effect! significantly the aim is over the next 5 years by 2030 have an estate fund that expends Circa £550,000.00 that is and will continue to contribute to the local economy as well as bring forward new investment. That’s true regeneration. Point to Note even as at today many on the estate are still not aware of Castle Point Councils intentions regards this estate.								

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											This draft local plan is not evidence based which is considered a very basic requirement of any local plan. I am confident that albeit the residents not the businesses of CPBC might allow this to go forward the inspector on reviewing & after due diligence will find this plan unsound thus reject it That rejection will come at an enormous cost to us the taxpayers of Castle Point. Officers & councillors for some reason have relayed / conveyed a figure of £1.7M. against the cost of developing a compliant plan, quite why they relayed that figure I'm not sure, perhaps they thought the resident would be swayed to say yes!								
0079-0001	Individual	Steve	Wood		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No		No	A	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites",	North-West Thundersley and Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and	N

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											added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.						has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050.	also the August 2025 North West Thundersley transport evidence. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	

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																	Total housing target of 11,000.		
0079-0002	Individual	Steve	Wood		Yes	C4	No		No	Justified, Consistent with National policy	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		No		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0080-0001	Individual	Lynne	Cornish		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No		No	A	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development	North-West Thundersley and Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to	N

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											infrastructure, the proposed 3316 urban homes for Canvey is not resident led.						should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
0080-0002	Individual	Lynne	Cornish		Yes	C4	No		No	Justified, Consistent with National policy	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		No		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0081-0001	Individual	Karen	Attenbury		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No		No	A	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. Add North West	North-West Thundersley and Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	N

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																	Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.		
008 1-000 2	Individual	Karen	Attenbury		Yes	C4	No		No	Justified, Consistent with National policy	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		No		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0082-0001	Individual	Lorraine	Cutbertson		Not Stated	SP3	No	I do not believe the plan to be sound nor legally compliant. I find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: • Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. • I understand that we have to have some development on Canvey Island but the proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. • The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. • North West Thundersley offers a	No	Justified, Consistent with National policy	While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. The Plan's approach to biodiversity and environmental protection also requires strengthening. Paragraph 180 of the NPPF makes clear that development should not proceed where it would result in significant harm to biodiversity or protected sites unless that harm can be fully mitigated. While the draft Plan identifies a range of mitigation measures, it does not yet provide enforceable delivery mechanisms. Without clear implementation pathways, these measures risk remaining theoretical rather than practical. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.	Not Stated		Yes, ECC Floor Risk Consultation	B - see 0082-0003 to 0005	Objections on: • 5 Year housing supply - Not identified as required under NPPF 78. • Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution. • SA - NW Thundersley not adequately assessed. • Biodiversity - No enforceable delivery mechanisms or implementation pathways to address NPPF 180. Mitigation measure identified but theoretical rather than practical. • Canvey: Concerns over flood risk. SUDS must be designed with a full understanding of Canvey's unique drainage context. • Green Belt: Welcome decision not to include green belt sites. • North West Thundersley should	Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. North West Thundersley has been considered, including in the Sustainability Appraisal. SA Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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								sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. Many of the reasons given in the CPBC report, issued last week, as to why NWT is not a suitable site are relevant to Canvey Island which has the added issues of tidal flood risk and drainage issues. • The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024).			for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest. Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are,					have been included.	The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy ‘ A Better Connected Essex’ has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to	Strategic Flood Risk Assessment (SFRA).	

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											positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53%													Canvey. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	

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											of the Government’s housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government’s impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is								

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											not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. The NPPF is clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island’s already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS’ measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island’s unique geography and drainage infrastructure. The island’s low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey’s ground conditions								

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											make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council’s plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. I understand the West site of CI was not included in CP's Flood Risk Assessment (May 2025). The Council looked at 35 sites, West Canvey not among them and yet still allocated 2,700 homes for development to West Canvey. The 2015 Multi-Agency Partnership identified that Canvey needed major drainage investment before any significant development								

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											could proceed safely. Nearly a decade later, Anglian Water - has invested nothing in upgrading the island's capacity. Anglian Water has been fined this month for not maintaining its systems. So why do we think they are going to make any improvements to ours! It is claimed that Essex County Council, who are responsible for managing flood risk in our area, had 'endorsed CPBC plans to build the proposed 2700 home estate on Canvey Island.' A Freedom of information request was made to confirm this claim and ECC stated they had not been consulted on the West Canvey site. Please see attached which lists which information was requested and ECC's response. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite								

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											its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. Particularly when West Canvey was not included in CP's Flood Risk Assessment in May 2025. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council's evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage								

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											Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a								

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											brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I								

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											commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve									

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											pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site. The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite								

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											its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County								

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											Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through								

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											informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages - one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan’s soundness under paragraph 35, but also reflect a more balanced, evidence-led, and								

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											community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland’s Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission								

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											to the Planning Inspectorate.								
0082-0002	Individual	Lorraine	Cuthbertson		Not Stated	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No	Justified, Consistent with National policy			Not Stated		Yes, ECC Floor Risk Consultation	B - see 0082-0003 to 0005	• Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0082-0003	Individual	Lorraine	Cutbertson			SP3	Not Stated		No	Not stated	West of Canvey Road (GB1) The Council claim the parcel lies adjacent to the urban edge and therefore makes a weaker contribution to openness ¹ . West of Canvey Road is essential to the integrity of Canvey Island's landscape. Far from being derelict, it provides a critical buffer between residential areas and hazardous COMAH-designated industrial sites. The land also performs a floodplain function in a borough where surface water and tidal flooding are already major concerns. Its open aspect gives relief from urban intensity and provides resilience against climate challenges. Reclassifying such a strategically important piece of land as Grey Belt is wholly inappropriate and contrary to the NPPF's requirement to safeguard land from encroachment ² .					No	Objects to the assessment and categorisation of West of Canvey Road (GB1). Provides evidence that it isn't Grey Belt.	Noted	N

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											1 = Housing Capacity Topic Paper (August 2025), pp.39–46. Table 13.10: list of Grey Belt parcels and commentary. “Land adjacent to settlement edge with reduced openness...” (p.40). “Fragmented ownership reduces contribution to Green Belt purposes.” (p.41). “Equestrian land considered less open.” (p.44). 2 = National Planning Policy Framework (Dec 2024) Para 138: Green Belt serves five purposes including preventing sprawl and safeguarding countryside. Para 143: Green Belt boundaries should only be altered in exceptional circumstances. Para 147: Inappropriate development is harmful and should not be approved except in very special circumstances.									

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0082-0004	Individual	Lorraine	Cuthbertson			SP3	Not Stated		No	Not stated	East of Canvey Road (GB3) The Council's justification for classing it as 'Grey Belt' land seems to be is that it is adjacent to existing built area was and previously considered for development, therefore seen as lower value¹. This parcel is wrongly characterised. East of Canvey Road provides separation between industrial uses and residential communities. Its open nature prevents ribbon development along this strategic road and offers necessary land for drainage and flood resilience. Canvey is already over-allocated with housing in this draft plan, to designate such land as Grey Belt ignores the island's unique vulnerability and the strong evidence from Essex County Council's Section 19 Flood Report³. 1 = Housing Capacity Topic Paper (August 2025), pp.39–46. Table 13.10: list of Grey Belt parcels and commentary. "Land adjacent to settlement edge with reduced openness..." (p.40). "Fragmented ownership reduces contribution to Green Belt purposes." (p.41). "Equestrian land considered less open."					No	Objects to the assessment and categorisation of East of Canvey Road (GB3). Provides evidence that it isn't Grey Belt.	Noted	N

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											(p.44). 3 = Section 19 Flood Investigation Report – Castle Point (Essex County Council, 2022) “Surface water flooding across Canvey Island demonstrates the severe limitations of drainage infrastructure.” (p.12). “Increased impermeable surfaces will exacerbate flood risk.” (p.23)."								
0082-0005	Individual	Lorraine	Cuthbertson			SP3	No		No	Not stated	Land South of Charfleets (GB3) The Council’s justification for classing it as ‘Grey Belt’ land seems to be the proximity to Charfleets industrial estate and perception of reduced “connectivity” ¹ . Land South of Charfleets forms a vital open break preventing sprawl from overwhelming this industrial area. Its greenery offsets industrial activity, provides amenity value and performs drainage functions. To downgrade it because of industrial adjacency is to misunderstand Green Belt policy, the NPPF explicitly highlights safeguarding the countryside from encroachment as a key purpose ² . A better and more balanced alternative, infrastructure-led growth at the appropriate location,					No	Objects to the assessment and categorisation of Land South of Charfleets (GB3). Provides evidence that it isn't Grey Belt.	Noted	N

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											namely North West Thundersley (the Blinking Owl site), is available and would protect the Borough’s most treasured open spaces while also giving the Plan a realistic prospect of being found sound. I think it is profoundly wrong and dishonest to not classify all or if not significantly more of the site as ‘Grey Belt’ when it features far more derelict, underused and plotland sites that provide little or no amenity to local residents. 1 = Housing Capacity Topic Paper (August 2025), pp.39–46. Table 13.10: list of Grey Belt parcels and commentary. “Land adjacent to settlement edge with reduced openness...” (p.40). “Fragmented ownership reduces contribution to Green Belt purposes.” (p.41). “Equestrian land considered less open.” (p.44). 2 = National Planning Policy Framework (Dec 2024) Para 138: Green Belt serves five purposes including preventing sprawl and safeguarding countryside. Para 143: Green Belt boundaries should only be altered in exceptional								

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											circumstances. Para 147: Inappropriate development is harmful and should not be approved except in very special circumstances.								
0083-0001	Individual	Christine	Eagleson		Not Stated	SP3	Not Stated	Not Stated	No	Justified, Consistent with National policy	I consider the Castlepoint Plan Regulation 19 draft to be unsound. It fails the test of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castlepoint and the site ignores Greenbelt/Greybelt against new NPPF guidelines. The plan needs amending, current plan allows for the over development of Castlepoint,especially Canvey Island, there is a lack of infrastructure, sewerage and drainage, along with flooding implications. Flooding, is of a concern due to be victims of surface water and sewage in 2014, [REDACTED]. Also no mention of extra access on and off the Island.		No		No	A	It is not consistent with national policy, it doesn't meet the housing target for Castlepoint and the site ignores Greenbelt/Greybelt against new NPPF guidelines. The plan needs amending, current plan allows for the over development of Castlepoint,especially Canvey Island, there is a lack of infrastructure, sewerage and drainage, along with flooding implications. Flooding, is of a concern due to be victims of surface water and sewage in 2014, when we	Objects that housing target not met, while also saying the current plan allows for the over development of Castlepoint,especially Canvey Island. Infrastructure Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA).	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastru

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																	[REDACTED] Also no mention of extra access on and off the Island.	Canvey Access The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan	cture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0084-0001	Individual	Debbie	Veal		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No		No		It has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050.	North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport	N

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											Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Total housing target of 11,000.	evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Other comments noted	
0085-0001	Individual	Claire	Wilson		Yes	Whole Plan	Yes	I consider the draft plan to be legally compliant	Yes		I consider the draft plan to be sound.		Not Stated		No		Castle Point Plan is sound and legally compliant,	Support Noted	N
0086-0001	Individual	Lacey	Pek		Not Stated	Had 2	No	I wish to raise a serious concern regarding the Castle Point Local Plan Had2 (Regulation 19) consultation.	No	Not Stated	The process for submitting objections is unnecessarily complex, with requirements for specific policy references, page numbers, table references, and map numbers that are extremely difficult for ordinary residents to identify without specialist planning knowledge. This creates a serious barrier to democratic participation and effectively silences opposition by making it almost impossible for residents to respond meaningfully. I believe this approach is deliberate,		Not Stated		No		I wish to raise a serious concern regarding the Castle Point Local Plan Had2 (Regulation 19) consultation. The process for submitting objections is unnecessarily complex, with requirements for specific policy references, page numbers, table references, and map numbers that	Comments noted and placed on record	N

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											designed to reduce the number of objections recorded. This is unacceptable and undermines public trust in both the Council and the planning system as a whole. I therefore ask that this concern is formally acknowledged, recorded, and raised with the Planning Inspectorate. The consultation process should be accessible, fair, and transparent to all residents — not just those with professional planning expertise.						are extremely difficult for ordinary residents to identify without specialist planning knowledge. This creates a serious barrier to democratic participation and effectively silences opposition by making it almost impossible for residents to respond meaningfully. I believe this approach is deliberate, designed to reduce the number of objections recorded. This is unacceptable and undermines public trust in both the Council and the planning system as a whole. I therefore ask that this concern is formally acknowledged, recorded, and raised with the Planning Inspectorate. The consultation process should be accessible, fair, and transparent to		

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																	all residents — not just those with professional planning expertise.		
0087-0001	Individual	Christina	Watson		Yes	SP3	No	I DO NOT consider the draft plan to be legally compliant. Reason: Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATIONS: Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. I consent to my full name being published alongside my comments for this consultation.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County

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																	Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0087-0002	Individual	Christina	Watson		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Justified, consistent with national policy			No		No		Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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008-0001	Individual	Roy	Watson		Yes	SP3	No	I DO NOT consider the draft plan to be legally compliant. Reason: Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATIONS: Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. I consent to my full name being published alongside my comments for this consultation.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																	measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Strategic Flood Risk Assessment (SFRA).
0088-0002	Individual	Roy	Watson		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Justified, consistent with national policy			No		No		Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0089-0001	Individual	Alan	Dawes		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible fiveyear housing land supply.	No	Justified, consistent with national policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Manor	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(

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											guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. The inclusion of the Manor Trading Estate (MTE) as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to	Trading Industrial Estate site from the plan. Total housing target of 11,000.					year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West	allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered	s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. Note, I do not wish to participate at the oral examination. I am happy that my name will be published alongside my comments to the Castle Point Plan Regulation 19 consultation. Please acknowledge receipt of my submission.						homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	through the SFRA.	
0089-0002	Individual	Alan	Dawes		Yes	B8	No	This B8 policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on MTE. This policy is not evidence based, but records show poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on the MTE.	No	Justified,	CPBC vision is to create an environment that promotes business on MTE, by removing a 25% of its employment space for housing. This vision will mean MTE businesses will be forced to move to Canvey employment zones, as previously suggested that any increase in commercial / industrial area could be accommodated on Canvey. ECC will relay objections in that any residential units near protected facilities will undoubtedly increase noise complaints. CPBC's Officers Mapping area the MTE is incorrect and misleads the public, as MTE is a max of 12.5 Ha and not the 14 Ha stated, as it does not include the properties which all front Church Road. The MTE Road & footways network is privately owned, so who will		No		No		This B8 policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on MTE. CPBC vision is to create an environment that promotes business on MTE, by removing a 25% of its employment space for housing. This vision will mean MTE businesses will be forced to move to Canvey employment zones, as previously suggested that any increase in	Manor Trading Estate: Policy B8 part 6 states 'A programme of renewal of the industrial and commercial building stock within the estate with the overall aim of an increase in floor space of at least 10%' Paragraph 9.28 states 'It is not the intention of the Master Plan to result in a loss of employment on this site. Overall, the Master Plan should seek a modest increase in the floor space available for industrial and commercial	N

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											fund the new roads, footways and cycle paths across private land. The future plans for Manor Trading Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Manor Trading Industrial estate for housing, with business integrated with residential homes.						commercial / industrial area could be accommodated on Canvey. ECC will relay objections in that any residential units near protected facilities will undoubtedly increase noise complaints. CPBC's Officers Mapping area the MTE is incorrect and misleads the public, as MTE is a max of 12.5 Ha and not the 14 Ha stated, as it does not include the properties which all front Church Road. The MTE Road & footways network is privately owned, so who will fund the new roads, footways and cycle paths across private land. The future plans for Manor Trading Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Manor Trading Industrial estate for housing,	uses to support economic growth. This will be secured through the revised approach to design and parking.'	

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																	with business integrated with residential homes.		
0090-0001	Individual	Sue	Greenway		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design

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											for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0090-0002	Individual	Sue	Greenway		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with	Needs of emergency services considered in the supporting	N

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																	emergency evacuation procedures	Infrastructure Delivery Plan (IDP).	
0091-0001	Individual	Corrine	Greenway		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex

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											considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	(SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	and the Castle Point Strategic Flood Risk Assessment (SFRA).
0091-0002	Individual	Corrine	Greenway		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0092-0001	Individual	Dave	Bailey		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No	A	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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											operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Strategic Flood Risk Assessment (SFRA).
0092-0002	Individual	Dave	Bailey		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	No	Not Stated			No		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0093-0001	Individual	Marilyn	Smith		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No		I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The site selection strategy is biased and predetermined towards a 'no greenbelt build policy' The site selection is solely based on the 'over development of Brownfield sites'. The plan has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. The NPPF guidelines state development should be directed away from areas at highest risk of flooding. SuDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																	measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Strategic Flood Risk Assessment (SFRA).
0093-0002	Individual	Marilyn	Smith		Yes	C4	No	The proposed number of Canvey West homes puts residents to the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0094-0001	Individual	Jam es	Rob bins		Yes	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a	No	Justified, Consistent with National policy	I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: • Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. • The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. • The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. • North West Thundersley offers a	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No t Sta ted		No	A	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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								cherished part of our landscape and heritage. They must be protected wherever possible. However,I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded ‘Blinking Owl Site’. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley			sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. • The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan’s credibility. Policy						measures are not appropriate for Canvey Island’s unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Strategic Flood Risk Assessment (SFRA).

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								and it has no credible five-year housing land supply.			SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest. Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory								

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											tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing								

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											figure than the proposed target. The Plan proposes to deliver only around 53% of the Government’s housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government’s impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan								

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											unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. The NPPF is clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island’s already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS’ measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island’s unique geography and drainage infrastructure. The island’s low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely								

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											on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns								

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											and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island’s geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council’s commitment to requiring								

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											Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey’s unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves								

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											credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its								

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											protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable								

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											location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance								

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											on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex.								

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											Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-								

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											based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages - one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced,								

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											evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a								

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											strategic opportunity for sustainable growth. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate. I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is								

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											not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that									

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											are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.								
0094-0002	Individual	James	Robbins		Yes	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation	No	Not Stated			Not Stated		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								that Statements of Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0095-0001	Individual	Donna	Bateman		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,

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											proposed 3316 urban homes for Canvey is not resident led.						based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0095-0002	Individual	Donna	Bateman		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency	Needs of emergency services considered in the supporting Infrastructure	N

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																	evacuation procedures	Delivery Plan (IDP).	
0096-0001	Individual	Cliff	Cornish		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA).	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																	highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Castle Point Strategic Flood Risk Assessment (SFRA).
0096-0002	Individual	Cliff	Cornish		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0097-0001	Individual	Dawn	Rumsey		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to NOT BE LEGALLY COMPLIANT, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with the national policy. It is not consistent with the National Policy, it does not meet the housing target for Castle Point and the sites	I believe the following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound 1. Add North West Thundersley site, 187 Ha, as Greenbelt, Grey Belt, Brownfield site option for 7500 homes.	No			B - see 0097-0003	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a	Y - Policy SD3(3) 3. Proposals must demonstrate how the

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											selection ignores Greenbelt and Grey Belt against new NPPF guidelines. I consider it not to be justified as the site selection strategy is biased and pre-determined towards a “no Greenbelt build policy”, it is solely based on the over development of “brownfield sites”, it has not considered all sites, with no greenbelt/grey belt sites added and with the exclusion of the North West Thundersley site the NPPF guidelines state that developments should be directed away from areas at the highest risk of flooding, SUDs measures are not appropriate for Canvey Island’s unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes put residents in the East at risk with any emergency evacuation procedures. I consider it not to be legally prepared and sound due to the two hazardous installations located at the south of Canvey Island which are regulated by the HSE in accordance with the Control of Major Accident Hazards Regulations and would pose additional risk to any potential occupants of any	2. Reduce the urban housing target to 3500 from 6200 with Canvey at 1050 3. Remove Charfleet’s Industrial Estate site from the plan Total Housing target of 11,000					homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn’t meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island’s unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and	preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options	SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council’s SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											new developments. I believe that has been poor engagement and officers have not engaged with the HSE on proposed developments which fall within the consultation zones of hazardous installations.						the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	have been considered through the SFRA.	
0097-0002	Individual	Dawn	Rumsey		Yes	C4	No		No	Justified, Consistent with National policy	The inclusion of Charfleet's Industrial Estate as a brownfield site for development into a mixed use of housing and industrial area has not fully considered the impact on the micro, small, medium and large businesses currently operating on the estate who are currently renting property or own their own site. There is no assessment of how they will be able to be operationally or financially continue to operate in said area. Should they be forced to move to new premises or have restrictions imposed upon their existing operations in the future due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement and officers have not engaged with the majority of the	I believe the following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound 1. Add North West Thundersley site, 187 Ha, as Greenbelt, Grey Belt, Brownfield site option for 7500 homes. 2. Reduce the urban housing target to 3500 from 6200 with Canvey at 1050 3. Remove Charfleet's Industrial Estate site from the plan Total Housing target of 11,000	No			B - see 0097-0003	Charfleets: Objects to the inclusion of Charfleet's Industrial Estate for development into a mixed use of housing and industrial. Has not fully considered the impact on the existing businesses. There has been poor engagement.	Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes	N

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											businesses currently on the Charfleet's Industrial Estate. The future plans of the Charfleet's Industrial Estate needs a fully supported, with full economic regeneration of the estate. There is no reasoned justification for using Charfleet's Industrial Estate for housing, with businesses integrated with residential homes.								
0097-0003	Individual	Dawn	Rumsey		Yes	C4					This plan clearly neglects the factor that Canvey Island has ONE ROAD OFF - The two roads converge at the waterside roundabout which causes issues at rush hour times and also should an incident occur - ie, broken down vehicle, vehicle involved in a RTA - The proposed number of dwellings as outline in your planning regulation would see on average - of 2 cars per dwelling an extra 6,000 vehicles using the two roads. Six thousand vehicles converging at the roundabouts and traffic lights - another reason as to why I consider this plan not to be legally prepared and sound. I can find no plans to build additional schools (primary and secondary), dentist surgeries, GP surgeries to accommodate the proposed additional residents for these new dwellings.		No			No	This plan clearly neglects the factor that Canvey Island has ONE ROAD OFF - The two roads converge at the waterside roundabout which causes issues at rush hour times and also should an incident occur - ie, broken down vehicle, vehicle involved in a RTA - The proposed number of dwellings as outline in your planning regulation would see on average - of 2 cars per dwelling an extra 6,000 vehicles using the two roads. Six thousand vehicles converging at the roundabouts and traffic lights - another reason as to why I consider	Highways Impacts The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	N

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																	this plan not to be legally prepared and sound. I can find no plans to build additional schools (primary and secondary), dentist surgeries, GP surgeries to accommodate the proposed additional residents for these new dwellings.		
0098-0001	Individual	Lee	McGonagle		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,

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											proposed 3316 urban homes for Canvey is not resident led.						based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA) .
0098-0002	Individual	Lee	McGonagle		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency	Needs of emergency services considered in the supporting Infrastructure	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																	evacuation procedures	Delivery Plan (IDP).	
0099-0001	Individual	Susan	Saac		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA).	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the

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											micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Castle Point Strategic Flood Risk Assessment (SFRA).
0099-0002	Individual	Susan	Saadc		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0100-0001	Individual	Terry	Morris		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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											operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Strategic Flood Risk Assessment (SFRA).
0100-0002	Individual	Terry	Morris		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0101-0001	Individual	Tina	Gregory		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led,.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No		No	A	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																	measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Strategic Flood Risk Assessment (SFRA).
0101-0002	Individual	Tina	Gregory		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0102-0001	Individual	Neil	Gregory		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at	No		No	A	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led,.	1050. Total housing target of 11,000.					year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West	allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered	s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																	homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	through the SFRA.	
0102-0002	Individual	Neil	Gregory		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0103-0001	Individual	Mary	Stevens		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led,.						The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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0103-0002	Individual	Mary	Stevens		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0104-0001	Individual	Alan	Spiller		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council'

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	s SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0104-	Individual	Alan	Spiller		Yes	C4	No	The number of Canvey West homes puts residents in the	No	Not Stated			No		No		The number of Canvey West homes puts	Needs of emergency services	N

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0002								East at risk with emergency evacuation procedures.									residents in the East at risk with emergency evacuation procedures	considered in the supporting Infrastructure Delivery Plan (IDP).	
0105-0001	Individual	Sonia	Dowsett		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No	A	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide

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											mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0105-0002	Individual	Sonia	Dowsett		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No	A	The number of Canvey West homes puts residents in the East at risk with emergency	Needs of emergency services considered in the supporting Infrastructure	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																	evacuation procedures	Delivery Plan (IDP).	
0106-0001	Individual	Bernadette	Purcell		Yes	SP3	No	Dear Sir/Madam I do NOT support the Castle Point Plan Regulation 19 Draft Consultation. I consider the Castle Point Plan Regulation 19 Draft to NOT be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.			I consider the Castle Point Plan Regulation 19 Draft to be UNSOUND. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes, reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, and a total housing target of 11,000.	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA).	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites.						highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Castle Point Strategic Flood Risk Assessment (SFRA).
0106-0002	Individual	Bernadette	Purcel		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0107-0001	Individual	Tracey	Empson		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500	No		No		It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a	Y - Policy SD3(3) 3. Proposals must demonstrate how the

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											ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their	from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.					homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and	preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options	SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. Charfleets: Objects to inclusion of residential and lack of engagement,	have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement ' the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes	
0107-0002	Individual	Tracey	Empson		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0108-0001	Individual	Carol	Fisher		Yes	SP3	No	Dear Sir/Madam, This is my own personal response to the Castle Point Plan Regulation 19 Draft consultation. Policy reference/name: SP3 / C4 Page number: 25-26 / 40-41 Paragraph number: 6.32-6.35 / 8.33-8.40 I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000. It also does not take into account the additional traffic to be added to the already extremely congested daily traffic problems. Also doesn't consider the local infrastructure and the need of extra dentists, doctors surgeries and schools which will be required. A third road off the Island is a necessity before any such plans should be considered.	No		No	A	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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											use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. Charfleets: Objects to inclusion of residential and lack of engagement,	and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes	Strategic Flood Risk Assessment (SFRA).
0108-0002	Individual	Carol	Fisher		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No	A	The number of Canvey West homes puts residents in the East at risk with	Needs of emergency services considered in the supporting	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																	emergency evacuation procedures	Infrastructure Delivery Plan (IDP).	
0109-0001	Individual	Tim	McGinley		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000	No		No	A	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. No credible five-year housing land supply. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed	North-west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex

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											considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	(SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	and the Castle Point Strategic Flood Risk Assessment (SFRA).
0109-0002	Individual	Tim	McGinley		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0110-0001	Individual	Karen	Edwards		Yes	Whole Plan	Yes	Dear Sir/Madam I support the Castle Point Plan Regulation 19 Draft Consultation I consider the draft plan to be legally compliant I consider the draft plan to be sound I consent to my full name being published alongside my comments for this consultation.	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N
0111-0001	Individual	Sian	Debenham		Yes	Whole Plan	Yes	Dear Sir/Madam I support the Castle Point Plan Regulation 19 Draft Consultation I consider the draft plan to be legally compliant I consider the draft plan to be sound I consent to my full name being published alongside my comments for this consultation.	Yes				Not Stated		No		Castle Point Plan is sound and legally compliant,	Support Noted	N
0112-0001	Individual	Tova	Breach		Yes	Whole Plan	Yes	Dear Sir/Madam I support the Castle Point Plan Regulation 19 Draft Consultation I consider the draft plan to be legally compliant I consider the draft plan to be sound I consent to my full name being published alongside my comments for this consultation.	Yes				Not Stated		No		Castle Point Plan is sound and legally compliant,	Support Noted	N
0113-0001	Individual	D	Darlington		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to	No		No	A	It has failed to consider strategic alternatives like North West Thundersley which should be added as a Greenbelt, Grey Belt, Brownfield site option for 7500	North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a	Y - Policy SD3(3) 3. Proposals must demonstrate how the

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their	3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000					homes. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added. The NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options	SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	have been considered through the SFRA.	
0113-0002	Individual	D	Darlington		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0114-0001	Individual	Susan	Ross		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s)

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0114-0002	Individual	Susan	Ross		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency	Needs of emergency services considered in the supporting Infrastructure	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																	evacuation procedures	Delivery Plan (IDP).	
0115-0001	Individual	Laura	Webb		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	B - see 0115-0003	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																			Castle Point Strategic Flood Risk Assessment (SFRA).
0115-0002	Individual	Laura	Webb		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	B - see 0115-0003	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0115-0003	Individual	Laura	Webb		Yes	SP3	Not Stated		Not Stated	Not Stated	I completely object to any further building in any area of castle point!! And if you guys can't see his ridiculous this is you shouldn't be doing this job! Add in the " we've made an error" is absolutely laughable!!! I COMPLETELY OBJECT TO ANY BUILDING IN THE AREA!!!!!!		Not Stated		No	None	Completely objects to further building in Castle Point	Noted	N
0116-0001	Individual	Oliver	Smith		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of	PROPOSED MODIFICATION: Add North West Thundersley site.	No		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA).	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the

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											Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0116-0002	Individual	Oliver	Smith		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0117-0001	Individual	Sarah	Bentley		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																			Strategic Flood Risk Assessment (SFRA).
0117-0002	Individual	Sarah	Bentley		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0118-0001	Individual	Rachel	Newcombe		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,

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											Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	considered through the SFRA.	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0118-0002	Individual	Rachel	Newcombe		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0119-0001	Individual	Carol	Welfare		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond

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											on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	(SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0119-0002	Individual	Carol	Welfare		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0120-0001	Individual	Barbara	Harrison		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																			Strategic Flood Risk Assessment (SFRA).
0120-0002	Individual	Barbara	Harrison		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0121-0001	Individual	Susannah	Miles		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,

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											Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	considered through the SFRA.	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0121-0002	Individual	Susannah	Miles		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0122-0001	Individual	Kathy	Phipps		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond

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											on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	(SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0122-0002	Individual	Kathy	Phipps		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0123-0001	Individual	Victoria	Smith		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																			Strategic Flood Risk Assessment (SFRA).
0123-0002	Individual	Victoria	Smith		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0124-0001	Individual	Adrian	Davis		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,

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											Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	considered through the SFRA.	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0124-0002	Individual	Adrian	Davis		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0125-0001	Individual	Daniel	Smart		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond

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											on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	(SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0125-0002	Individual	Daniel	Smart		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0126-0001	Individual	Ryan	Morris		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																			Strategic Flood Risk Assessment (SFRA).
0126-0002	Individual	Ryan	Morris		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0127-0001	Individual	Jack	Deal		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,

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											Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	considered through the SFRA.	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0127-0002	Individual	Jack	Deal		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0128-0001	Individual	Charlie	Stocker		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond

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											on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	(SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0128-0002	Individual	Charlie	Stocker		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0129-0001	Individual	Ian	Stewart Johnson		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																			Strategic Flood Risk Assessment (SFRA).
0129-0002	Individual	Ian	Stewart Johnson		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0130-0001	Removed as no permission given to publish.												Not Stated		No				
0130-0002	Removed as no permission given to publish.												Not Stated		No				
0131-0001	Individual	Gemma	Cosgrove		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA).	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the

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											Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0131-0002	Individual	Gemma	Cosgrove		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0132-0001	Individual	Daniel	Tubwhittington		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																			Strategic Flood Risk Assessment (SFRA).
013 2-000 2	Individual	Daniel	Tubwhittington		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
013 3-000 1	Individual	Daniel	Tubwhittington		Yes	SP3	No	I am writing to formally object to the proposed development of 3,316 houses on Canvey Island. While I understand the pressure for housing across the region, the scale and location of this proposal raises serious concerns regarding flood risk, transport accessibility, and existing infrastructure capacity. 1. Flood Risk Canvey Island is a low-lying area almost entirely below sea level, relying on flood defences and drainage systems for protection. The Environment Agency classifies Canvey as a high flood-risk zone. Adding 3,316 homes would put thousands more people at risk should sea defences fail or extreme weather events occur. National Planning Policy Framework (NPPF) requires that new developments in flood risk areas demonstrate a robust			Without a third road or alternative access route, the proposed development is unsafe and unsustainable, placing future and current residents at unnecessary risk. 3. Infrastructure Constraints Healthcare: Canvey's existing GP surgeries, dental practices, and Southend/ Basildon hospitals are already overstretched. There is no evidence of additional provision to meet the huge demand this development would generate. Education: Local schools are near or at capacity. No concrete plans for new schools or expansions have been presented. Utilities and Drainage: The island's drainage and sewage systems are known to be fragile, with regular surface water flooding after heavy rainfall. Adding thousands more households will	I urge the planning authority to reject this proposal or, at minimum, require a full independent review of flood resilience, transport infrastructure (including a third road), and service capacity before any consideration of such a large-scale development.	Not Stated		No		Objects to the proposed development of 3,316 houses on Canvey Island, this proposal raises serious concerns regarding flood risk, transport accessibility, and existing infrastructure capacity. 1. Flood Risk Canvey Island is a low-lying area almost entirely below sea level, relying on flood defences and drainage systems for protection. The Environment Agency classifies Canvey as a high flood-risk zone. Adding 3,316 homes would put thousands more people at risk	Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SuDS: Policy SD3 covers SuDS and part 3 states they must reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,

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								flood risk assessment and show that risks can be safely managed without increasing danger to existing residents. This proposal does not provide convincing evidence of long-term resilience. Climate change forecasts indicate rising sea levels and more intense rainfall events, which will further increase the risk beyond current predictions. 2. Transport and Access (No Third Road) Canvey Island currently has only two access roads (Canvey Way and Somnes Avenue), both of which are heavily congested at peak times. Emergency services access is already compromised when incidents occur. Adding thousands of households will significantly worsen congestion and response times.			overload these systems. Emergency Planning: In a flood or evacuation scenario, current infrastructure could not safely support the island's existing population, let alone an expanded one. 4. Scale and Sustainability The scale of 3,316 houses is disproportionate to the size and capacity of Canvey Island. Sustainable development must balance housing needs with environmental, safety, and community impacts. This proposal fails to meet that balance. Conclusion For the reasons above, I strongly object to the proposed development of 3,316 houses on Canvey Island. The combination of severe flood risk, inadequate road access, and insufficient infrastructure makes this an unsafe and unsustainable development that would put both new and existing residents at risk.						should sea defences fail or extreme weather events occur. National Planning Policy Framework (NPPF) requires that new developments in flood risk areas demonstrate a robust flood risk assessment and show that risks can be safely managed without increasing danger to existing residents. This proposal does not provide convincing evidence of long-term resilience. Climate change forecasts indicate rising sea levels and more intense rainfall events, which will further increase the risk beyond current predictions. 2. Transport and Access (No Third Road) Canvey Island currently has only two access roads (Canvey Way and Somnes Avenue), both of which are heavily congested at peak times. Emergency services access is	have been considered through the SFRA. Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Infrastructure matters, including schools, are covered by policies INFRA1-6 and the supporting Infrastructure	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																	already compromised when incidents occur. Adding thousands of households will significantly worsen congestion and response times. Without a third road or alternative access route, the proposed development is unsafe and unsustainable, placing future and current residents at unnecessary risk. 3. Infrastructure Constraints Healthcare: Canvey's existing GP surgeries, dental practices, and Southend/ Basildon hospitals are already overstretched. There is no evidence of additional provision to meet the huge demand this development would generate. Education: Local schools are near or at capacity. No concrete plans for new schools or expansions have been presented.	Delivery Plan (IDP).	

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																	Utilities and Drainage: The island's drainage and sewage systems are known to be fragile, with regular surface water flooding after heavy rainfall. Adding thousands more households will overload these systems. Emergency Planning: In a flood or evacuation scenario, current infrastructure could not safely support the island's existing population, let alone an expanded one. 4. Scale and Sustainability The scale of 3,316 houses is disproportionate to the size and capacity of Canvey Island. Sustainable development must balance housing needs with environmental, safety, and community impacts. This proposal fails to meet that balance.		

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0134-0001	Individual	Bridie Anne	Kike ros		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																			Strategic Flood Risk Assessment (SFRA).
0134-0002	Individual	Bridie Anne	Kike ros		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0135-0001	Individual	Hayley	Cregan		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,

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											Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	considered through the SFRA.	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0135-0002	Individual	Hayley	Cregan		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0136-0001	Individual	Lorraine	Adams		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond

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											on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	(SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0136-0002	Individual	Lorraine	Adams		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0137-0001	Individual	Gillian	Harper		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																			Strategic Flood Risk Assessment (SFRA).
0137-0002	Individual	Gillian	Harper		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0138-0001	Individual	Janet	Davis		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,

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											Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	considered through the SFRA.	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0138-0002	Individual	Jane	Davis		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0139-0001	Individual	Shelley	Neill		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond

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											on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	(SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0139-0002	Individual	Shelley	Neill		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0140-0001	Individual	Lee	Sumnerfield		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																			Strategic Flood Risk Assessment (SFRA).
0140-0002	Individual	Lee	Summerville		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0141-0001	Individual	Sean	Marney		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,

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											Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	considered through the SFRA.	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
014 1-000 2	Individual	Sean	Marney		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
014 2-000 1	Individual	Jemma	Roches		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond

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0142-0002	Individual	Jemma	Rocher		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0143-0001	Individual	Paul	Turnaine		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																			Strategic Flood Risk Assessment (SFRA).
0143-0002	Individual	Paul	Turmaine		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0144-0001	Individual	Samantha	Blewer		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	considered through the SFRA.	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
014-4-0002	Individual	Samantha	Blewer		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
014-5-0001	Individual	Pat	Taylor		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond

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											on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	(SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0145-0002	Individual	Pat	Taylor		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0146-0001	Individual	Jacqueline	Cranfield		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																			Strategic Flood Risk Assessment (SFRA).
0146-0002	Individual	Jacqueline	Cranfield		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0147-0001	Individual	Bradley	Swann		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,

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											Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	considered through the SFRA.	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0147-0002	Individual	Bradley	Swann		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0148-0001	Individual	Paul	Williamson		Yes	SP3	No	I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond

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											based on the "over development of Brownfield sites". Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey Island doesn't have the infrastructure to deal with 3000+ new homes. As it is there is very limited doctors places and very difficult to get a dentist. The current road network would not cope with the extra traffic.						development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	(SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0148-0002	Individual	Paul	Williamson		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0149-0001	Individual	Michael	Brown		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																			Strategic Flood Risk Assessment (SFRA).
0149-0002	Individual	Michael	Brown		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0150-0001	Individual	Jessica	Osborne		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,

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											Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	considered through the SFRA.	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0150-0002	Individual	Jessica	Osborne		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0151-0001	Individual	Jan	Lewis		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond

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											on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	(SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0151-0002	Individual	Jan	Lewis		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0152-0001	Individual	Daphne	Brown		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																			Strategic Flood Risk Assessment (SFRA).
015 2-000 2	Individual	Daphne	Brown		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
015 3-000 1	Individual	Jani ce	Osborne		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	considered through the SFRA.	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0153-0002	Individual	Janice	Osborne		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0154-0001	Individual	Annemarie	Dennis		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond

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											on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	(SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0154-0002	Individual	Annemarie	Dennis		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0155-0001	Individual	Stephen	Osborne	Not stated	Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																			Strategic Flood Risk Assessment (SFRA).
0155-0002	Individual	Stephen	Osborne	Not stated	Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0156-0001	Individual	Ian	Whitlock		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	> I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey	PROPOSED MODIFICATION: Add North West Thundersley site. There has been no new road off Canvey Island since the 1970s, the population has tripled and the per person number of cars has increased. Also consider the option of a train station on Canvey Island.... does that sound difficult? Well so does living without adequate links and increased population and a flooding safety hazard. The housing quota should also at least be equally divided among the district, with Daws Heath also being considered (although I do assume that councillors live there so don't want to devalue their own area?). Daws Heath has great access to the A127 so could increase the use of St Michael's Road. Any housing planned should be in the character of the area. E.g. bungalows and houses. Not blocks of flats that	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,

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											Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Ultimately, if housing is required on Canvey Island, increased infrastructure needs to be first, and not after the new housing.	would alter the character of the area to something of a London suburb.					and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	considered through the SFRA.	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0156-0002	Individual	Ian	Whitlock		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0157-0001	Individual	S J	Murray		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000	Not Stated		No	A	Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond

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											build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on							site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. Object for proposals for residential on Charfleets	reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.							Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement ' <i>the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'</i>	
0157-0002	Individual	S J	Murray		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0158-0001	Individual	C J	Murray		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000	Not Stated		No	A	Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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											are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						of 11,000. Object for proposals for residential on Charfleets	circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	Strategic Flood Risk Assessment (SFRA).
0158-0002	Individual	C J	Murray		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0159-0001	Individual	Barry	Brazier		Yes	Whole Plan	Yes	I fully support the Strategic policies SP1, SP2 and SP3 contained within the Castle Point Plan Regulation 19 Consultation. These policies are supported by detailed reasoned justification taking into account the constraints imposed, particularly the small land area of the Borough and the need to retain as much green space as possible for the well-being of the existing and future population. Paragraphs 6.3, 6.4 and 6.5 are particularly relevant. The ensuing policies within the Plan are consistent with, expand and develop this strategic approach.	Yes		I therefore believe the Plan to be sound in that it is - a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs and is consistent with achieving sustainable development; b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; c) Effective – deliverable over the plan period, d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.		Not Stated		No	A	Supports the Plan and considers it to be legally compliant and sound. These policies are supported by detailed reasoned justification taking into account the constraints imposed, particularly the small land area of the Borough and the need to retain as much green space as possible for the well-being of the existing and future population. Paragraphs 6.3, 6.4 and 6.5 are particularly relevant.	Support noted.	N
0160-0001	Individual	Bruce	Walford		Yes	Whole Plan	Yes	I support castle point plan regulation draft 19 consultation	Yes		I support castle point plan regulation draft 19 consultation		Not Stated		No	A	Supports the Plan. It is legally sound, well prepared, and in line with national planning policy. It sets out a clear approach for sustainable development across the borough. Evidence is strong, the policies are reasonable, and the proposals are achievable.	Support noted.	N

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0161-0001	Individual	Norma	Blamey		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy.It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATIONS: Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option for 7,500 homes. Reduce the urban housing target to 3,500 from 6,200, with Canvey at 1,050. Total housing target of 11,000.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																			Strategic Flood Risk Assessment (SFRA).
0161-0002	Individual	Norma	Blamey		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures, because although there are 2 roads to enter/exit the Island, they both meet at the same roundabout (Waterside Farm) and regularly gridlock at busy times or in the event of another activity away from the Island.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0162-0001	Individual	Gabriella	Kwolek		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy.It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at	PROPOSED MODIFICATIONS: Add North West Thundersley site	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sounded?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0162-0002	Individual	Gabriella	Kwolek		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states	Y - Policy SD3(3) 'Proposals must demonstrate how the SuDS feature(s) reflect and respond to the constraints of the specific

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																	development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	geographic location , site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex, the Castle Point Strategic Flood Risk Assessment (SFRA) and recommendations/advice from statutory bodies (includi

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																			ng EA, Essex LLFA).'
0163-0001	Individual	Brenda	Watson		Yes	Whole Plan	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant Reason: The draft local plan is not justified and consistent with national policy.	No	Justified, Consistent with National policy			Not Stated		No		Doesn't support the Castle Point Plan Regulation 19 Draft Consultation. Doesn't consider the draft plan to be legally compliant Reason: The draft local plan is not justified and consistent with national policy.	Noted	N
0164-0001	Individual	Paul	Harbord		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Remove Manor Trading Estate site from the plan. Total housing target of 11,000.	Not Stated		No	A	Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-

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											be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led The inclusion of the Charfleets Industrial estates as brownfield sites for development into mixed use housing and industrial areas has not fully considered the impact on micro, small, medium and large businesses currently operating on the estates that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor to zero engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estates. The future plans for Charfleets Industrial estates needs a fully supported, full economic						flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. Object for proposals for residential on Charfleets	2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class	blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estates for housing, with business integrated with residential homes.							<i>E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'</i>	
0164-0002	Individual	Paul	Harbord		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0164-0003	Individual	Paul	Harbord		Yes	B8	No	The B8 policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on Manor Trading Estate(MTE). This policy is not evidence based, but records show poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on the MTE. CPBC's vision is to create an environment that promotes business on MTE, by removing 25% of its employment space for	No	Not Stated			Not Stated		No	A	Policy B8 Manor Trading Estate The B8 policy is not evidence based, and officers have not engaged. CPBC's vision is to create an environment that promotes business on MTE, by removing 25% of its employment space for housing. This vision will mean MTE businesses will be forced to move to Canvey employment zones, as it has been previously	Manor Trading Estate: Policy B8 part 6 states 'A programme of renewal of the industrial and commercial building stock within the estate with the overall aim of an increase in floor space of at least 10%' Paragraph 9.28 states ' It is not the intention of the Master Plan to result in a loss of employment on this site.	N

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								housing. This vision will mean MTE businesses will be forced to move to Canvey employment zones, as it has been previously suggested that any increase in commercial / industrial area could be accommodated on Canvey. ECC will relay objections in that any residential units near protected facilities will undoubtedly increase noise complaints. CPBC's Officers Mapping of the MTE is incorrect and misleads the public, as MTE is a max of 12.5 Ha and not the 14 Ha stated, as it does not include the properties which all front Church Road. The MTE Road & footways network is privately owned, so who will fund the new roads, footways and cycle paths across private land. The future plans for Manor Trading Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Manor Trading Industrial estate for housing, with business integrated with residential homes.									suggested that any increase in commercial / industrial area could be accommodated on Canvey. ECC will relay objections in that any residential units near protected facilities will undoubtedly increase noise complaints. CPBC's Officers Mapping of the MTE is incorrect and misleads the public, as MTE is a max of 12.5 Ha and not the 14 Ha stated, as it does not include the properties which all front Church Road. The MTE Road & footways network is privately owned, so who will fund the new roads, footways and cycle paths across private land. The future plans for Manor Trading Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Manor	Overall, the Master Plan should seek a modest increase in the floor space available for industrial and commercial uses to support economic growth. This will be secured through the revised approach to design and parking.'	

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																	Trading Industrial estate for housing, with business integrated with residential homes.		
0165-0001	Individual	The resa	Merlane		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to NOT be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be UNSOUND. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes, reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, and a total housing target of 11,000.	Not Stated		No	A	The site selection strategy is biased and predetermined towards a "no Greenbelt build policy", All our precious Greenbelt sites need total protection from government intervention. it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and North West Thundersley site. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500	Green Belt/Grey belt covered under policy GB2. North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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											policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites.						homes. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.		
0166-0001	Individual	Peter	Artley		Not Stated	SP3	Not Stated		No	Justified, Consistent with National policy	I consider the Castlepoint Plan regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It not consistent with national policy, it doesn't meet the housing target for Castlepoint, and the site ignores Greenbelt/Greybelt against new NPPF guidelines. The plan needs amending, current plan allows for the over development of Castlepoint especially Canvey Island,	Adding the North West Thundersley site as an alternative gives us the housing numbers required, we can then reduce the over development of our urban sites. Considering NW Thundersley will give a housing target of 11000.	Not Stated		No		It not consistent with national policy, it doesn't meet the housing target for Castlepoint, and the site ignores Greenbelt/Greybelt against new NPPF guidelines. Current plan allows for the over development of Castlepoint especially Canvey Island, there is a lack of	Green Belt/Grey belt covered under policy GB2. North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											there is a lack of infrastructure, sewerage and drainage, along with flooding implications.						infrastructure, sewerage and drainage, along with flooding implications. Adding the North West Thundersley site as an alternative gives us the housing numbers required, we can then reduce the over development of our urban sites. Considering NW Thundersley will give a housing target of 11000.	2025 North West Thundersley transport evidence. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Infrastructure Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
0167-0001	Individual	Vivien	Drew		Not Stated	SP3	Not Stated	Hi Very pleased to see that no green or grey belt land will not be built on. We must protect our environment, we need the trees to breathe and woods, fields and green spaces for wild life. Benfleet in particular doesn't have the infrastructure to cope with over development. We put our trust in our local council and I think under all the pressure they are so under	Not Stated				Not Stated		No		Very pleased to see that no green or grey belt land will not be built on. We must protect our environment, we need the trees to breathe and woods, fields and green spaces for wild life. Benfleet in particular doesn't have the infrastructure to	Support norted.	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
								for development they have been strong enough to have saved our green belt.									cope with over development. We put our trust in our local council and I think under all the pressure they are so under for development they have been strong enough to have saved our green belt.		
0168-0001	Individual	Barbara	Topham		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure,	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000. A third road off the Island is a necessity before any such plans should be considered.	No		No	A	Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Object for proposals for residential on Charfleets	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have

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											the proposed 3316 urban homes for Canvey is not resident led, The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes. It also does not take											SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement ' <i>the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment</i>	regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											into account the additional traffic to be added to the already extremely congested daily traffic problems. Also doesn't consider the local infrastructure and the need of extra dentists, doctors surgeries and schools which will be required.							<i>nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'</i>	
0168-0002	Individual	Barbara	Topham		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0169-0001	Individual	Sharon	Mansfield		Not Stated	SP3	Not Stated	Please accept this email as my opposition to the plan as I have found it very difficult and frustrating filling in the online form. As a resident of Canvey I represent not only myself but 4 other family households who have equally struggled with the form . Our objections are that the total housing allocated cannot be delivered without proper infrastructure and services at present our only exit of Canvey is via waterside farm so in theory we only have one exit not 2. congestion for this area is already a big concern. Over the last 39years more houses have been built with less amenities ie schools and doctors which has created problems for	Not Stated	Not Stated	I accept new houses are needed but the volume Canvey island is expected to undertake with this plan will be detrimental to the island and residents. What would happen if there was a problem at the oil refinery or a flood with only one road for everyone to exit. I don't pretend I know anything about planning but as a resident I know building more than 3000 houses without better access for everyone is not viable. I understand there are more sustainable options in hadleigh & Benfleet (blinking owl).		Yes		No	A	Total housing allocated cannot be delivered without proper infrastructure and services. Canvey access: at present our only exit of Canvey is via waterside farm so in theory we only have one exit not 2. congestion for this area is already a big concern. Over the last 39years more houses have been built with less amenities ie schools and doctors which has created problems for residents children have to go off the island for schools and with the traffic	Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-

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								residents children have to go off the island for schools and with the traffic this is a nightmare. Canvey is unique in respect of it's below sea level position with this comes extra problems with flooding and definitely bad drainage.									this is a nightmare. Canvey is unique in respect of it's below sea level position with this comes extra problems with flooding and definitely bad drainage. I accept new houses are needed but the volume Canvey island is expected to undertake with this plan will be detrimental to the island and residents. Emergencies: What would happen if there was a problem at the oil refinery or a flood with only one road for everyone to exit. I understand there are more sustainable options in hadleigh & Benfleet (blinking owl).	Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred	blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		alternative for allocation) and also the August 2025 North West Thundersley transport evidence.	
0170-0001	Individual	John	Spurgeon		Not Stated	Had 4	Not Stated	I'll be sending you this email in response to a leaflet that was put through my door last week. We have concerns over the amount of housing that is proposed in the above reference. In the last proposal we received it suggested in the region of 65 homes, and now it 114! One of our concerns will be the parking on the road, considering the development of Scrub Mews which allows parking in Scrub Lane despite them having off road parking, this causes many problems with traffic, and is dangerous to traffic coming out of Bilton Road! If this is allowed for this development it will be dangerous, as this road is already used as a pick up for the school morning and afternoon!	Not Stated	Not Stated	Our other concern is Scrub lane is only a small road and can't cope with the traffic and parking at this present time, so considering there could be another 200 plus cars from this development and also the infrastructure for schools and doctors in high demand, how is all this going to be met!	A more reasonable amount of property's should be suggested as this is excessive! As we have lived in Scrub Lane for [REDACTED], since it was an unmade Lane, I'm not opposed to development, but this will spoil the area by making it over developed!	No		No		Concerns over the amount of housing that is proposed. Concerns with parking on the road, considering the development of Scrub Mews which allows parking in Scrub Lane despite them having off road parking, this causes many problems with traffic, and is dangerous to traffic coming out of Bilton Road! If this is allowed for this development it will be dangerous, as this road is already used as a pick up for the school morning and afternoon!. Further concern is Scrub lane is only a small road and can't cope with the traffic and parking at this present time, so considering there could be another 200 plus cars from this development	Parking provision covered under Policy T7 . Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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																	and also the infrastructure for schools and doctors in high demand, how is all this going to be met!.		
0171-0001	Individual	Alan	Kipps		Not Stated	Whole Plan	Not Stated	Dear Chief Planning Officer, In response to your Castle Point Section 19 Consultation, Dame Rebecca Harris has very kindly sent us the link to her own excellent, very thorough and detailed, response and my wife and I support (with enthusiasm) every word of it. Like her, we are extremely worried at the major weaknesses and deficiencies of the Council's draft as it stands (e.g. in particular the virtual omission of our biggest card, the NW. Thundersley site, the inadequate appreciation of the importance of flood considerations throughout, even regarding Canvey of all places, and the impossible proposal of 3,000 new homes on Canvey) all of which we think threaten a disastrous outcome for Castle Point, whether from the Planning Inspector or from eventual resulting development. As Dame Rebecca Harris has pointed out, the designation as "grey belt" of perfectly valid, normal	Not Stated	Not Stated		We do hope that, as a result of the consultation, the draft is given a radical rethink. (And we endorse fully her comment about the difficulty arising from the form of the consultation document, which will need to be taken into account in considering its general response.)	Not Stated		No	B	NW Thundersley should have been included. Proposed allocation to Canvey Island is disproportionate. Inadequate appreciation of the importance of flood considerations throughout, even regarding Canvey	North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site	Y - Policy SD3(3) 'Proposals must demonstrate how the SuDS feature(s) reflect and respond to the constraints of the specific geographic location , site circumstances, landscape character and the green-blue infrastructure network, and

ID Ref	Individual/Organisation/Age nt?	Firs t Na me	Last Na me	If orga nisat ion - nam e	Has agree d to publi catio n of Name /Com ment s?	Poli cy/ Par a No.	2a. Leg ally Co mp lia nt?	2b. If No, explanation	3a. So und?	3b. Positive/Eff ective/Justif ied/Consist ent?	3c. Explanation	4. Suggested modifications	5. Wi sh to par tici pat e in ex am	6. Why?	Sup porti ng Evid enc e sup plie d?	Opt ion A, B or C	Summary	Officer Response	Mods Require d			
								Green Belt land, in order to boost the Council's response to the Government's housebuilding target for Castle Point, is clearly improper, It is also a betrayal of the public's trust in the People's Independent Party', who made protection of the Green Belt their outstanding election promise. The provision for Canvey Island of 3,000 new homes would be a disgrace, in terms of amenity basics, if it were feasible. As it is however, a moment's thought reveals it as fantasy. Given the Island's geographical constraints and existing daily traffic problems, it is simply a formula for permanent total gridlock. I should also like to make a comment about the Salvation Army land fronting the A13. Like everybody else, I was enormously relieved when, as the result of public pressure, this iconic strip was taken out of the Plan as a potential site for housing development. But the fact that it was ever included was, in planning terms, criminal.													circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	have regard to Essex County Council's SuDS Design Guide for Essex, the Castle Point Strategic Flood Risk Assessment (SFRA) and recommendations/advice from statutory bodies (including EA, Essex LLFA).'

ID Ref	Individual/Organisation/Age nt?	Firs t Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. So und?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0172-0001	Individual	Una	Kipps		Not Stated	Whole Plan	Not Stated	Dear Chief Planning Officer, In response to your Castle Point Section 19 Consultation, Dame Rebecca Harris has very kindly sent us the link to her own excellent, very thorough and detailed, response and my wife and I support (with enthusiasm) every word of it. Like her, we are extremely worried at the major weaknesses and deficiencies of the Council's draft as it stands (e.g. in particular the virtual omission of our biggest card, the NW. Thundersley site, the inadequate appreciation of the importance of flood considerations throughout, even regarding Canvey of all places, and the impossible proposal of 3,000 new homes on Canvey) all of which we think threaten a disastrous outcome for Castle Point, whether from the Planning Inspector or from eventual resulting development.	Not Stated	Not Stated		We do hope that, as a result of the consultation, the draft is given a radical rethink. (And we endorse fully her comment about the difficulty arising from the form of the consultation document, which will need to be taken into account in considering its general response.)	Not Stated		No		NW Thundersley should have been included. Proposed allocation to Canvey Island is disproportionate. Inadequate appreciation of the importance of flood considerations throughout, even regarding Canvey	North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	Y - Policy SD3(3) 'Proposals must demonstrate how the SuDS feature(s) reflect and respond to the constraints of the specific geographic location , site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design

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																		considered through the SFRA.	Guide for Essex, the Castle Point Strategic Flood Risk Assessment (SFRA) and recommendations/advice from statutory bodies (including EA, Essex LLFA).'
0173-0001	Individual	Mark	Burton		Yes	SP3	No	Dear Sir/Madam, I am writing to formally object to the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT support the draft plan, as I do not consider it to be legally compliant or sound. Legal Compliance The plan fails to consider strategic alternatives such as North West Thundersley. * It does not provide a credible five-year housing land supply.			Soundness The draft local plan is not justified or consistent with national policy. The housing target for Castle Point is not being met appropriately. The site selection process is biased, predetermined towards a “no greenbelt build policy,” and based on the overdevelopment of brownfield sites. Greenbelt and Grey Belt sites have not been properly considered, specifically excluding North West Thundersley. Flood Risk and Infrastructure NPPF guidelines state that development should be directed away from areas at highest risk of flooding.	Proposed Modification Add North West Thundersley as a housing site option.	Not Stated		No		Proposed allocation to Canvey Island is disproportionate. Inadequate appreciation of the importance of flood considerations throughout, even regarding Canvey . Sustainable drainage measures are not suitable for Canvey Island.. Canvey Island is uniquely vulnerable due to its geography and drainage infrastructure, making large-scale	Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure covered by policies and	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landsc

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											Canvey Island is uniquely vulnerable due to its geography and drainage infrastructure, making large-scale development unsafe. Sustainable drainage measures are not suitable for Canvey Island. Building 3,300+ homes on Canvey will put residents at significant risk in the event of an emergency evacuation. The current plan does not address essential infrastructure improvements required to support this scale of development.						development unsafe. Building 3,300+ homes on Canvey will put residents at significant risk in the event of an emergency evacuation. The current plan does not address essential infrastructure improvements required to support this scale of development.	supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs: Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	pe character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0174-0001	Individual	Maureen	Brazier		Yes	Whole Plan	Yes	Dear Sir I support the Castle Point Plan Regulation 19 Draft Consultation.	Yes		I believe that the current council (People's Independent Party) have worked tirelessly to present a plan which preserves the green belt areas of Castle Point. The very essence of Castle Point is the mix of developed areas interspersed with fields and wooded areas. This gives breathing space for people to unwind by viewing from afar. Access to all is not needed, simply the chance		Not Stated		No	A	Supports the Plan The very essence of Castle Point is the mix of developed areas interspersed with fields and wooded areas. I support the council in their protection of green belt and their encouraging development on already developed	Support noted.	N

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											to be able to stop and stare, and watch and hear the bird life or see horses grazing is all part of what makes this area such a good place in which to live. As does the chance to be able to hear what children are saying as they return home after a day at school rather than their voices being drowned out by passing traffic. And it is also vital to the abundant wildlife in the area. The fields, trees and hedges act as a bridge or corridor for wildlife to move along from the outer woodlands and fields. I support the council in their protection of green belt and their encouraging development on already developed land or brown field areas. I consider the draft plan to be sound.						land or brown field areas.		
0175-0001	Individual	Laura	Long		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites".	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site

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											sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0175-0002	Individual	Laura	Long		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0176-0001	Individual	Debbie	Wood		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																			Strategic Flood Risk Assessment (SFRA).
0176-0002	Individual	Debbie	Wood		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0177-0001	Individual	Desmond	Neville		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site

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											Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	considered through the SFRA.	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0177-0002	Individual	Desmond	Neville		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0178-0001	Individual	Wendy	Neville		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond

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											on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	(SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0178-0002	Individual	Wendy	Neville		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0179-0001	Individual	Tracy	Sewell		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																			Strategic Flood Risk Assessment (SFRA).
0179-0002	Individual	Tracy	Sewell		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0180-0001	Individual	Lyn da	Farr er		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site

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											Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	considered through the SFRA.	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0180-0002	Individual	Lyn da	Farr er		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No t Sta ted		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0181-0001	Individual	Bria n	Ston e		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based	PROPOSED MODIFICATION: Add North West Thundersley site.	No t Sta ted		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond

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											on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	(SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0181-0002	Individual	Brian	Stone		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0182-0001	Individual	Patricia	Beasley		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																			Strategic Flood Risk Assessment (SFRA).
018 2-000 2	Individual	Patricia	Beasley		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
018 3-000 1	Individual	Dawn	Wheeler-Boreham		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	considered through the SFRA.	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
018 3-000 2	Individual	Dawn	Wheeler-Boreham		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
018 4-000 1	Individual	Deby	Harris		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond

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											on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	(SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0184-0002	Individual	Deby	Harris		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0185-0001	Individual	Samantha	Duffield		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																			Strategic Flood Risk Assessment (SFRA).
0185-0002	Individual	Samantha	Duffield		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0186-0001	ERROR																		
0187-0001	ERROR																		
0188-0001	ERROR																		
0189-0001	ERROR																		
0190-0001	Individual	Margaret	Blamey		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the	Y - Policy SD3(3). 3. Proposals must demonstrate how the SuDS feature(s)

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0190-0002	Individual	Margaret	Blamey		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency	Needs of emergency services considered in the supporting Infrastructure	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																	evacuation procedures	Delivery Plan (IDP).	
0191-0001	Individual	Mark	Duffield		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																	evacuation procedures.		Castle Point Strategic Flood Risk Assessment (SFRA).
0191-0002	Individual	Mark	Duffield		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0192-0001	Individual	Alyssa	Duffield		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to the site circumstances, landscape character and the green-blue infrastru	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastru

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	SuDS options have been considered through the SFRA.	cture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
019 2-000 2	Individual	Alyssa	Duffield		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
019 3-000 1	Individual	Paul	Holland		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0193-0002	Individual	Paul	Holland		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0194-0001	Individual	Louise	Holland		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																			Strategic Flood Risk Assessment (SFRA).
0194-0002	Individual	Louise	Holland		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0195-0001	Individual	Dulcie	McGovern		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,

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											Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	considered through the SFRA.	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0195-0002	Individual	Dulcie	McGovern		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0196-0001	Individual	John	Steward		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond

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											on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	(SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0196-0002	Individual	John	Steward		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0197-0001	Individual	Caroline	West		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																			Strategic Flood Risk Assessment (SFRA).
0197-0002	Individual	Caroline	West		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0198-0001	Individual	Donna	Garner		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site

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											Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	considered through the SFRA.	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0198-0002	Individual	Donna	Garner		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0199-0001	Individual	Julia	Connor		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond

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											on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	(SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0199-0002	Individual	Julia	Connor		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0200-0001	Individual	Sue	Jackson		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																			Strategic Flood Risk Assessment (SFRA).
0200-0002	Individual	Sue	Jackson		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0201-0001	Individual	Lisa	Haggerty		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network,

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	considered through the SFRA.	and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0201-0002	Individual	Lisa	Haggerty		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0202-0001	Individual	Claire	Fenton		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Housing target for Castle Point not met. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over	Green Belt/Grey belt covered under policy GB2. All reasonable sites considered in both the supporting SLAA and SA processes. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond

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											on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	(SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0202-0002	Individual	Claire	Fenlon		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0203-0001	Individual	Paul	Overbury		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No		Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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											operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						of 11,000. Object for proposals for residential on Charfleets	circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	Strategic Flood Risk Assessment (SFRA).
0203-0002	Individual	Paul	Overbury		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0204-0001	Individual	Ma eve	John stone		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No		Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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											operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						of 11,000. Object for proposals for residential on Charfleets	circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	Strategic Flood Risk Assessment (SFRA).
0204-0002	Individual	Maeve	Johnstone		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0205-0001	Individual	Halley	Cockayne		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No		Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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											operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						of 11,000. Object for proposals for residential on Charfleets	circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	Strategic Flood Risk Assessment (SFRA).
0205-0002	Individual	Halley	Cockayne		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0206-0001	Individual	Simon	Stallwood		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Manor Trading Estate (MTE) as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Manor Trading Industrial Estate site from the plan. Total housing target of 11,000. Note, I do not wish to participate at the oral examination.	No		No		Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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											operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties.						of 11,000. Object for proposals for residential on Charfleets	circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	Strategic Flood Risk Assessment (SFRA).
0206-0002	Individual	Simon	Stallwood		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sounded?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0206-0003	Individual	Simon	Stallwood		Yes	B8	No	This B8 policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on MTE. This policy is not evidence based, but records show poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on the MTE. CBC vision is to create an environment that promotes business on MTE, by removing a 25% of its employment space for housing. This vision will mean MTE businesses will be forced to move to Canvey employment zones, as previously suggested that any increase in commercial / industrial area could be accommodated on Canvey. ECC will relay objections in that any residential units near protected facilities will undoubtedly increase noise complaints. CBC's Officers Mapping area the MTE is incorrect and misleads the public, as MTE is a max of 12.5 Ha and not the 14 Ha stated, as it does not include the properties which all front Church Road. The MTE Road & footways network is privately owned, so who will	Not Stated	Not Stated			No		No		Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site	Y - Policy SD3(3) 'Proposals must demonstrate how the SuDS feature(s) reflect and respond to the constraints of the specific geographic location , site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
								fund the new roads, footways and cycle paths across private land. The future plans for Manor Trading Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Manor Trading Industrial estate for housing, with business integrated with residential homes.									of 11,000. Object for proposals for residential on Charfleets	circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	Guide for Essex, the Castle Point Strategic Flood Risk Assessment (SFRA) and recommendations/advice from statutory bodies (including EA, Essex LLFA).'

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0207-0001	Individual	Richard	Smiten		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Manor Trading Estate (MTE) as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Manor Trading Industrial Estate site from the plan. Total housing target of 11,000. Note, I do not wish to participate at the oral examination.	No		No		Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050.	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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											operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties.						Total housing target of 11,000.	circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Strategic Flood Risk Assessment (SFRA).
0207-0002	Individual	Richard	Smiten		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0207-0003	Individual	Richard	Smiten		Yes	B8	No	This B8 policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on MTE. This policy is not evidence based, but records show poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on the MTE. CBC vision is to create an environment that promotes business on MTE, by removing a 25% of its employment space for housing. This vision will mean MTE businesses will	Not Stated	Not Stated			No		No		Policy B8 Manor Trading Estate The B8 policy is not evidence based, and officers have not engaged. CPBC's vision is to create an environment that promotes business on MTE, by removing 25% of its employment space for housing. This vision will mean MTE businesses will be forced to move to Canvey employment zones, as it has been previously suggested that any	Manor Trading Estate: Policy B8 part 6 states 'A programme of renewal of the industrial and commercial building stock within the estate with the overall aim of an increase in floor space of at least 10%' Paragraph 9.28 states 'It is not the intention of the Master Plan to result in a loss of employment on this site. Overall, the	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
								be forced to move to Canvey employment zones, as previously suggested that any increase in commercial / industrial area could be accommodated on Canvey. ECC will relay objections in that any residential units near protected facilities will undoubtedly increase noise complaints. CBC's Officers Mapping area the MTE is incorrect and misleads the public, as MTE is a max of 12.5 Ha and not the 14 Ha stated, as it does not include the properties which all front Church Road. The MTE Road & footways network is privately owned, so who will fund the new roads, footways and cycle paths across private land. The future plans for Manor Trading Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Manor Trading Industrial estate for housing, with business integrated with residential homes.									increase in commercial / industrial area could be accommodated on Canvey. ECC will relay objections in that any residential units near protected facilities will undoubtedly increase noise complaints. CPBC's Officers Mapping of the MTE is incorrect and misleads the public, as MTE is a max of 12.5 Ha and not the 14 Ha stated, as it does not include the properties which all front Church Road. The MTE Road & footways network is privately owned, so who will fund the new roads, footways and cycle paths across private land. The future plans for Manor Trading Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Manor Trading Industrial	Master Plan should seek a modest increase in the floor space available for industrial and commercial uses to support economic growth. This will be secured through the revised approach to design and parking.	

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																	estate for housing, with business integrated with residential homes.		
0208-0001	Individual	Gavin	Culford		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Manor Trading Estate	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Manor Trading Industrial Estate site from the plan. Total housing target of 11,000. Note, I do not wish to participate at the oral examination.	No		No		Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS

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											(MTE) as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties.						procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. Object for proposals for residential on Charfleets	SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0208-	Individual	Gavin	Culff		Yes	C4	No	The number of Canvey West homes puts residents in the	No	Not Stated			No		No		The number of Canvey West	Needs of emergency	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0002								East at risk with emergency evacuation procedures.									homes puts residents in the East at risk with emergency evacuation procedures	services considered in the supporting Infrastructure Delivery Plan (IDP).	
0208-0003	Individual	Gavin	Culford		Yes	B8	No	This B8 policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on MTE. This policy is not evidence based, but records show poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on the MTE. CBC vision is to create an environment that promotes business on MTE, by removing a 25% of its employment space for housing. This vision will mean MTE businesses will be forced to move to Canvey employment zones, as previously suggested that any increase in commercial / industrial area could be accommodated on Canvey. ECC will relay objections in that any residential units near protected facilities will undoubtedly increase noise complaints. CBC's Officers Mapping area the MTE is incorrect and misleads the public, as MTE is a max of 12.5 Ha and not the 14 Ha	Not Stated	Not Stated			No		No		Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures.	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	Y - Policy SD3(3) 'Proposals must demonstrate how the SuDS feature(s) reflect and respond to the constraints of the specific geographic location , site circumstances, landscape character and the green-blue infrastructure network, and have

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								stated, as it does not include the properties which all front Church Road. The MTE Road & footways network is privately owned, so who will fund the new roads, footways and cycle paths across private land. The future plans for Manor Trading Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Manor Trading Industrial estate for housing, with business integrated with residential homes.									Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. Object for proposals for residential on Charfleets	SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	regard to Essex County Council's SuDS Design Guide for Essex, the Castle Point Strategic Flood Risk Assessment (SFRA) and recommendations/advice from statutory bodies (including EA, Essex LLFA).'

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0209-0001	Individual	Pauline	Basford		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Manor Trading Estate (MTE) as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Manor Trading Industrial Estate site from the plan. Total housing target of 11,000. Note, I do not wish to participate at the oral examination.	No		No		Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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											operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties.						of 11,000. Object for proposals for residential on Charfleets	circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	Strategic Flood Risk Assessment (SFRA).
0209-0002	Individual	Pauline	Basford		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0209-0003	Individual	Pauline	Basford		Yes	B8	No	This B8 policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on MTE. This policy is not evidence based, but records show poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on the MTE. CBC vision is to create an environment that promotes business on MTE, by removing a 25% of its employment space for housing. This vision will mean MTE businesses will be forced to move to Canvey employment zones, as previously suggested that any increase in commercial / industrial area could be accommodated on Canvey. ECC will relay objections in that any residential units near protected facilities will undoubtedly increase noise complaints. CBC's Officers Mapping area the MTE is incorrect and misleads the public, as MTE is a max of 12.5 Ha and not the 14 Ha stated, as it does not include the properties which all front Church Road. The MTE Road & footways network is privately owned, so who will	Not Stated	Not Stated			No		No		This B8 policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on MTE. This policy is not evidence based, but records show poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on the MTE. CBC vision is to create an environment that promotes business on MTE, by removing a 25% of its employment space for housing. This vision will mean MTE businesses will be forced to move to Canvey employment zones, as previously suggested that any increase in commercial / industrial area could be accommodated on	Manor Trading Estate: Policy B8 part 6 states 'A programme of renewal of the industrial and commercial building stock within the estate with the overall aim of an increase in floor space of at least 10%' Paragraph 9.28 states ' It is not the intention of the Master Plan to result in a loss of employment on this site. Overall, the Master Plan should seek a modest increase in the floor space available for industrial and commercial uses to support economic growth. This will be secured through the revised approach to design and parking.	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
								fund the new roads, footways and cycle paths across private land. The future plans for Manor Trading Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Manor Trading Industrial estate for housing, with business integrated with residential homes.									Canvey. ECC will relay objections in that any residential units near protected facilities will undoubtedly increase noise complaints. CBC's Officers Mapping area the MTE is incorrect and misleads the public, as MTE is a max of 12.5 Ha and not the 14 Ha stated, as it does not include the properties which all front Church Road. The MTE Road & footways network is privately owned, so who will fund the new roads, footways and cycle paths across private land. The future plans for Manor Trading Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Manor Trading Industrial estate for housing, with business integrated with residential homes.		

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0210-0001	Individual	Andrew	Johnstone		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No	A	Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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											operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						of 11,000. Object for proposals for residential on Charfleets	circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	Strategic Flood Risk Assessment (SFRA).
0210-0002	Individual	Andrew	Johnstone		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0211-0001	Individual	Julie	Moon		Yes	Whole Plan	Yes	I would just like to inform you that I find the new Castlepoint draft plan to be legally prepared and sound and am happy for my details to be published and shared with The inspector if required.	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N
0212-0001	Individual	Gemma	Campbell		Not Stated	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. I have lived on Canvey island for [REDACTED] and love it here. However the traffic has become a nightmare even on a good day. How you expect to build 3000 new homes which will bring double the amount of cars I do not understand. I am already considering moving off the island as it has become a joke. I work [REDACTED] and the journey takes 30mins however in the morning I have to allow 1.5hrs to get to work. This will increase even more with extra housing. We do not have the capacity to cope in schools, doctors & the traffic. It is absolutely mad that this is even being considered. Clearly someone who doesn't live on Canvey has come up with the idea.	Not Stated				Not Stated		No		Traffic will not cope with the level of housing proposed on Canvey. Also no capacity to cope in schools, doctors	Highways Impacts: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Infrastructure matters (including education and health services) re covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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0213-0001	Individual	Julie	Russell		Yes	SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The site selection strategy is biased and predetermined towards a 'no greenbelt build policy' The site selection is solely based on the 'over development of Brownfield sites'. The plan has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. The NPPF guidelines state development should be directed away from areas at highest risk of flooding. SuDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No		No		Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050.	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA).	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																	Total housing target of 11,000.	SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Strategic Flood Risk Assessment (SFRA).
0213-0002	Individual	Julie	Russell		Yes	C4	No	The proposed number of Canvey West homes puts residents to the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0214-0001	Individual	Lynsey	Cutts		Not Stated	SP3	No	The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a	No	Justified, Consistent with National policy	That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to	Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point's current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These	Not Stated		No	A	Objections on: • 5 Year housing supply - Not identified as required under NPPF 78. • SA - NW Thundersley not adequately assessed. • Biodiversity - No enforceable delivery mechanisms or implementation pathways to address NPPF 180. Mitigation measure identified but theoretical rather than practical. • Canvey: Concerns over flood risk. SUDS must be designed with a full understanding of Canvey's unique drainage context. • Green Belt: Welcome decision not to include green belt sites. • North West Thundersley should have been included.	Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. North West Thundersley has been considered, including in the Sustainability Appraisal. SA Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. The plan has	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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								cherished part of our landscape and heritage. They must be protected wherever possible. However,I fear that the Plan in its current form will render this attempt at protection by the Council meaningless.			outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: • Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. • The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. • The Council’s removal of several Green Belt sites is commendable and reflects strong community engagement. • North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. • The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must	characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex							been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy ‘ A Better Connected Essex’ has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	Strategi c Flood Risk Assess ment (SFRA).

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											satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal	County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a								SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	

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											safeguards that ensure development is sustainable, justified, and in the public interest. Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and needs to show it has	significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of 'Grey Belt' plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages - one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan's soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. However, I believe the Plan requires							

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											considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government's housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared.	significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.							

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											The NPPF is clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island’s already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS’ measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island’s unique geography and drainage infrastructure. The island’s low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey’s ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems.								

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											Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure								

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											limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council's evidence base. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made								

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											contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development								

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											on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site’s residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its								

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											case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this								

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											format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland's Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0214-0002	Individual	Lynsey	Cutts		Not Stated	For word	No	While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. A key statutory requirement is the 'Duty to Cooperate'. This is	No	Not Stated			Not Stated		No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of Common Ground should be used to evidence this cooperation. In Castle Point’s case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0215-0001	Individual	Jackie	Gross		Yes	SP3	No	Dear Sir/Madam, I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn’t meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The site selection strategy is biased and predetermined towards a 'no greenbelt build policy' The site selection is solely based on the 'over development of Brownfield sites'. The plan has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000	No		No		Not consistent with national policy, it doesn’t meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes.	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landsc

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											the North West Thundersley site. The NPPF guidelines state development should be directed away from areas at highest risk of flooding. SuDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The proposed 3316 urban homes for Canvey is not resident led.						NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	pe character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0215-0002	Individual	Jackie	Gross		Yes	C4	No	The proposed number of Canvey West homes puts residents to the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0216-	Individual	Kathryn	Masters		Yes	Whole	Yes	Dear Sir/Madam I support the Castle Point Plan Regulation 19 Draft	Yes		I consider the draft plan to be sound		Not		No		Castle Point Plan is sound and legally compliant,	Support Noted	N

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0001						Plan		Consultation I consider the the draft lan to be legally compliant					Stated						
0217-0001	Individual	Steve	Desborough		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with National policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Not consistent with national policy, it doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites. Excluded the North West Thundersley site. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. NPPF states development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, and puts residents in the East at risk with emergency evacuation procedures. Reduce the urban housing target to 3500 from 6200,	Green Belt/Grey belt covered under policy GB2. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. SUDs: Policy SD3 covers SuDs and part 3 states	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex

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																	with Canvey at 1050. Total housing target of 11,000.	they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	and the Castle Point Strategic Flood Risk Assessment (SFRA).
0217-0002	Individual	Steve	Desborough		Yes	C4	No	The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0218-0001	Individual	Simon	Hart		Not Stated	SP3	Not Stated		No	Not Stated	Dear Inspector of the Castle Point Plan, I have been a resident of Castle Point for [Redacted Personal Information] , and a former Cllr of Castle Point, who has been involved in previous local plans and the very early stages of this plan. I would like to submit a brief opinion on this plan. First of all, the housing target for Castle Point is too high. This is not a NIMBY comment but one of simple fact, due to its topography, location, and highway structure. Any development in Southend, Rochford, and Rayleigh has to come through the Castle Point entry and exit points and on to Basildon. The current		Not Stated		No		The housing target for Castle Point is too high. This is not a NIMBY comment but one of simple fact, due to its topography, location, and highway structure. Any development in Southend, Rochford, and Rayleigh has to come through the Castle Point entry and exit points and on to Basildon. The current Castle Point Plan of over 6,000 homes within the urban areas will destroy the area completely, using	Comments noted. Infrastructure Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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											Castle Point Plan of over 6,000 homes within the urban areas will destroy the area completely, using most of the open areas , massively overdeveloping the urban areas, and increasing the housing density to an unacceptable level. The internal highway structure of Castle Point is generally at near capacity and massively at over capacity at peak times without this planned expansion. When I was involved in this plan, I seem to recall the urban area development capacity was estimated to be over 1,000, and a maximum including car parks , supermarkets, etc., was 3,000, and at that time, I raised concerns that maximising urban development would destroy Castle Point . Doubling the ridiculous 3,000 number is unacceptable overdevelopment of the residential areas that will affect everyone in Castle Point. I am not against development, as proven in my term as Chairman of Development Control , but must be right numbers in the right place . Please consider my points in your consideration of the soundness of the Castle Point Plan .						most of the open areas , massively overdeveloping the urban areas, and increasing the housing density to an unacceptable level. The internal highway structure of Castle Point is generally at near capacity and massively at over capacity at peak times without this planned expansion. When I was involved in this plan, I seem to recall the urban area development capacity was estimated to be over 1,000, and a maximum including car parks , supermarkets, etc., was 3,000, and at that time, I raised concerns that maximising urban development would destroy Castle Point . Doubling the ridiculous 3,000 number is unacceptable overdevelopment of the residential areas that will affect everyone in Castle Point. I am not against development, as		

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																	proven in my term as Chairman of Development Control , but must be right numbers in the right place .		
0219-0001	Individual	Graham	Bracci		Yes	SP3	Yes	1.01 Canvey Island is the most Densely Populated and Deprived part of Castle Point. Despite its social challenges and constrained infrastructure, it hosts 2 Top Tier COMAH sites, in very close proximity to the Residential neighbourhoods. These sites pose risks of catastrophic incidents due to mechanical failure, human error, or external threats. Increasing residential density near such installations elevates the potential consequences of a major incident. The COMAH regulations and associated Hazard Ranges are designed to limit exposure—not expand it. The juxtaposition of high-density housing with high-risk industrial infrastructure is antithetical to sustainable land-use planning. 1.02 Canvey Island is at, or just below Sea Level apart from a small area known as Canvey	No	Positively Prepared, Effective, Justified, Consistent with National Policy	Summary Statement This representation is submitted in response to the Regulation 19 consultation on the Castle Point Borough Council Local Plan 2026–2043. It is our view that the Plan fails all four tests of soundness as defined in the National Planning Policy Framework (NPPF). The Plan is underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. 1. Is the Plan Positively Prepared ? The Plan is not positively prepared to meet the area’s objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to		Yes	To introduce and explain any extra specific supporting evidence in relation to the matters raised in this submission during			Does not meet the area’s objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The Plan lacks proportionate evidence and fails to consider reasonable alternatives The Plan is not effective or deliverable given the known constraints. Major allocations such as West Canvey Island and the Seaview Road corridor lie within flood zones and lack infrastructure to	Noted	N

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								Heights. It is designated a Flood Zone 3A area. Whilst it has Sea Defences, it remains at Residual and Actual Risk of Tidal Flooding, a substantial planning issue. With the rising sea level, due to climate change, the protection afforded by these existing defences is decreasing, and is likely to fall below current target levels within the lifetime of any new developments. 1.03 Indicative flood defence raising requirements are as follows: • About 0.3m in 2040 (to a level of 6.7m AOD) • A further 1.4m in 2070 (to a level of 8.1m AOD) These increases depend on the rate of sea level rise. 1 1.04 These aspirational new raised sea defences may actually harm the sustainability of Canvey Island as a desirable location to live. “Whilst hard defences could potentially be raised within existing footprints, the structures would be tall, unattractive and restrict public access.” 2 1.05 Castle Point Borough Council, within Planning Matters suggest, as a general approach			extreme risks. The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. The Plan selectively identifies flood risk constraints (Footnote 7) and then actively proposes development in those high-risk areas. The NPPF 2024 explicitly removes the ability for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey. Conclusion: The Plan does not seek to meet development needs in a sustainable or safe manner. 2. Is the Plan Justified ? The Plan lacks proportionate evidence and fails to consider reasonable alternatives. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequencebased analysis for vulnerable populations. Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH			the Examination in Public (EiP) process			support emergency planning. Pressures on roads and healthcare are acknowledged but not resolved through binding delivery mechanisms. The Plan fails to meet the housing targets set by the Standard Methodology		

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								that “the continued development of Canvey Island is necessary to sustain the local community and prevent the social and economic blight of the settlement”. 3 1.06 However, this claim overlooks the NPPF requirement to avoid new housing in highconsequence flood zones unless there are no reasonably available lower-risk sites. Being such a small Borough, it is difficult to suggest that there are no more suitable sites in the near vicinity in lower Flood Risk Zones. 1.07 To claim that housing development improves “sustainability” in this context ignores the fundamental principle of avoiding development in high-consequence flood zones, as emphasised in the NPPF and Strategic Flood Risk Assessments. 1.08 True sustainability involves balancing environmental constraints, social well-being, and economic viability. Adding residential housing in a location with constrained evacuation routes, ageing infrastructure, and limited resilience planning, does not meet this balance.			(Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-prone areas, without demonstrating that safer alternatives were adequately considered. It fails to identify Canvey Island as a single flood cell requiring open space catchment areas for flood mitigation . Whilst the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey, despite failing to provide the required Level II SFRA Conclusion: The Plan is not based on proportionate evidence and fails to justify its spatial strategy. 3. Is the Plan Effective ? The Plan is not effective or deliverable given the known constraints. Major allocations such as West Canvey Island and the Seaview Road corridor lie within flood zones and lack infrastructure to support emergency planning.								

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								This does not comply with the NPPF’s Sequential Approach to Strategic Development Site Selection. 1.09 We are mindful of Castle Point Borough Council own officers advice to Councillors; “Given the risk to the population, various measures are required to deal with the concerns to human health and wellbeing. These include: • The need for an emergency plan to be in place; • The need for sea defences to be maintained and improved; • The need to maintain the population living in the flood risk zone at current levels or lower;” (My emphasis) 4 1.10 Also, Advice to CPBC, contained in the current Strategic Flood Risk Assessment Level1 “Recommendation 4-2 CPBC should pursue opportunities to move existing development from within the floodplain to areas with a lower risk of flooding.” (My emphasis) 1.11 To propose a Mixed Use Development at West Canvey will necessitate the use of Green Land, an area which, alongside other green			Pressures on roads and healthcare are acknowledged but not resolved through binding delivery mechanisms. The primary housing site is not shovel-ready and faces significant delivery time constraints, undermining the Plan’s ability to meet urgent housing needs. Conclusion: The Plan is not deliverable without significant risk to public safety and infrastructure capacity. 4. Consistent with National Policy ? The Plan fails to meet the housing targets set by the Standard Methodology and does not integrate consequence-based planning for flood risk or hazardous installations. This is contrary to NPPF guidance and Planning Practise Guidance on safe development and resilience. Furthermore, the Plan does not reflect legal duties under the Civil Contingencies Act 2004 or COMAH Regulations to plan for foreseeable emergencies. Conclusion: The Plan is inconsistent with national policy and statutory obligations for riskinformed development. In light of the								

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								areas, fulfilled an essential flood prevention purpose for nearby land during the Canvey Island 2014 Summer Flooding. Plus it will increase the Population at Risk of Flooding and a Hazardous Industry incident. 1.12 Essex County Council produced a 41 page Flood Investigation Report, into the “Canvey Island 2014 Summer Flood.” 5 This document was highly informative of the devastation caused and the shortcomings and failures of the various infrastructure and agencies, during the event. 1.13 Following this the “Canvey Island 6-Point Plan” 6 was produced to attempt to raise Government assistance in Funding. “The cost of a future flooding incident on the Island would be in the region of £274m per year in lost economic output, and up to £2.1bn in damage to residential property.” “Unless a strategic and wide reaching flood mitigation programme can be implemented, site based flood mitigation could be seen by developers as too expensive and			above, we respectfully request that the Castle Point Local Plan 2026–2043 be withdrawn or substantially revised to address the issues raised in this representation. The Plan must be re-evaluated to ensure it meets the tests of soundness, prioritises public safety, and complies with national policy and legal obligation. Is the Plan Legal ? On the basis that this plan has been constructed by professional planners, we could not consider ourselves qualified to challenge its legality, subsequently we are compelled to respond "YES" to this question. However, this submission sets out to indicate that CPBC draft Reg19 consultation may well prove to be unsound or even illegal, being neither positively prepared nor adequately evidenced. The advice provided at 1.09 and 1.10 of this submission, has not been made lightly and goes some way to support our argument that adopting a wholly no Green Belt development policy, at the expense of public safety is somewhat								

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								fragmented.”” In order to deliver this vital plan, all relevant agencies and central government need to work together and address the £24.5m funding shortfall.” 1.14 The approach to Government found that a detailed account of funding expenditure was required to proceed to consideration, and we are led to believe that is where the effort was left. 1.15 Initially, following the 2013 and 2014 Canvey Flooding, work was undertaken on the mapping of the Canvey Integrated Urban Drainage System, Drainage repairs, and Road drainage infrastructure maintenance undertaken. Unfortunately the regularity of these services receive inadequate finances, and rather than the promised more regular maintenance, they now receive less. 1.16 We are now informed that the Urban Greening Scenario Testing on Canvey Island would not produce a significant impact on Flood Risk. 7 1.17 We are also mindful of the Examining Inspector’s Letter of Advice to Castle Point Council, during the very first			perverse. Prioritising mainland Green Belt protection without fully accounting for major incident hazard range and the potential for catastrophic flood events on Canvey Island, effectively subdividing the borough’s communities, may make the draft CPBC Plan be deemed not only unreasonable but also unprincipled and corporately illogical.										

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								attempt to produce a CPBC Plan; “I have reservations about the methodology employed and the way in which it appears to have been used, leading to inconsistent and inappropriate site selection. For example, the Council’s own Sustainability Appraisal is unclear as to why the most sustainable Green Belt site was discounted. I therefore consider the Council needs to revisit its assessment of Green Belt locations paying particular regard to the five purposes of the Green Belt as set out in PPG2. I accept that other considerations will also influence the choice of sites but potential locations should not be dismissed because local factors are given too much weight. This appears to have happened previously. The Council’s desire to protect its Green Belt areas is understandable but its approach has also had a considerable bearing on the overall distribution of growth promoted in the Core Strategy. In this respect, I consider it would be difficult to endorse a strategy which commits to											

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								Green Belt release in an area of potential high flood risk at Canvey Island yet fails to identify more than a token amount of land on the mainland where flooding is not a significant issue. While I accept some development at Canvey Island may be required to meet local needs and to support services, I am not convinced that maintaining the current distribution of development across the Borough is justified given the existing constraints.” 8 1.18 Rather than developing more housing at a rate that will inevitably increase the numbers of population of Canvey Island at Risk of Flooding and / or a Hazardous Industrial Incident, caution should be applied and Development should be planned-for in a limited fashion by means of Regeneration. Thus providing work for the local Building Industry. 1.19 In these circumstances there is no place for the “Local Factors” previously recognised by Planning Inspector Mr P.Crysell, see above, to remain an influence on the											

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								skewed Housing Development Distribution contained within this latest version of the CPBC Plan. 1.20 Whilst this approach may be considered radical, we consider it essential that the Population level of Canvey Island be maintained at the same level, or lower, and that the Constraints indicated within the NPPF are justly applied for the benefits of the Health, Safety and Well-being of all Canvey Islanders. The Regeneration of Brownfield land should be the approach to enable Sustainable Development for Canvey Island.											

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0219-0002	Individual	Grham	Braci		Yes	SD1	Yes	CPBC Plan Page 170 6.01 In the further interest of public safety, there needs to be a realisation that Canvey Island is at risk of being inundated by the sea. Subsequently there needs to be a “Flood Risk Consequence Analysis” undertaken that evaluates the consequences, on the population living and working at or below sea level, following a major breach, or over-topping of its Sea Defences. 6.02 Policy SD1 rightly identifies Canvey Island as being at high risk of tidal flooding and sets out principles to avoid development in Flood Zone 3. However, Policy C4 proposes considerable development in West Canvey, which lies within this zone. This contradiction undermines the credibility of the Plan and raises concerns about the safety and sustainability of future development 6.03 Castle Point Borough Council continues to wrongly report / imply that the funding for Canvey Island’s Sea defence improvements has been secured. The Environment Agency via, its TE2100 plan, aspires to	No	Positively Prepared, Effective, Justified, Consistent with National Policy	Summary Statement This representation is submitted in response to the Regulation 19 consultation on the Castle Point Borough Council Local Plan 2026–2043. It is our view that the Plan fails all four tests of soundness as defined in the National Planning Policy Framework (NPPF). The Plan is underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. 1. Is the Plan Positively Prepared ? The Plan is not positively prepared to meet the area’s objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. The Plan selectively identifies flood risk constraints (Footnote 7)		Yes	To introduce and explain any extra specific supporting evidence in relation to the matters raised in this submission during the Examination in Public (EiP)		C	The Plan selectively identifies flood risk constraints (Footnote 7) and then actively proposes development in those high-risk areas. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequence based analysis for vulnerable populations.	Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SuDS Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 'Proposals must demonstrate how the SuDS feature(s) reflect and respond to the constraints of the specific geographic location , site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council’s SuDS Design

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								maintain and improve the present level of protection, in respect of rise in sea levels consistent with global warming predictions. However, the Environment Agency strongly emphasises that such improvements are subjected to funding and costeffectiveness. Without such improvements Canvey Island may become unsustainable as a settlement. 6.04 There has been extensive works undertaken via Strategic Flood Risk Assessments giving timescale, velocity and depths of sea inundation at several locations across Canvey Island. However, such works have failed to provide any indication as to the type and number of the population that would be engulfed within these inundation events. 6.05 With this in mind, we remain concerned by the methodology employed by Castle Point Borough Council in their application of the Sequential Test regarding development on Canvey Island. The Urban development only policy, effectively removes extensive option for			and then actively proposes development in those high-risk areas. The NPPF 2024 explicitly removes the ability for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey. Conclusion: The Plan does not seek to meet development needs in a sustainable or safe manner. 2. Is the Plan Justified ? The Plan lacks proportionate evidence and fails to consider reasonable alternatives. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequencebased analysis for vulnerable populations. Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-			process							Guide for Essex, the Castle Point Strategic Flood Risk Assessment (SFRA) and recommendations/advice from statutory bodies (including EA, Essex LLFA).'

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								sequentially testing alternative sites at other areas of the borough. 6.06 Given the extremely problematic logistical access and egress issues when planning for a breach of defended locations on Canvey Island, 14 it is imperative that where it may be intended to increase the numbers at risk or consequences of inundation, that site selection is informed by the findings of a "Major Breach of Sea Defence Consequence Analysis" 6.07 The overlapping of survey maps, imaging the landscape of the borough likely to be encompassed by such potential incidents, will provide a reasonable indication of the likely make up and numbers of the population and the severity of injuries 15 In doing so assisting CPBC with the undertaking of the duties placed upon them via the Civil Contingency Act. 6.08 Regarding Canvey Island’s Green Belt and Green Field spaces, we consider these areas valuable and essential assets when considering Flood Risk, whether from Tidal or Surface			prone areas, without demonstrating that safer alternatives were adequately considered. It fails to identify Canvey Island as a single flood cell requiring open space catchment areas for flood mitigation . Whilst the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey, despite failing to provide the required Level II SFRA Conclusion: The Plan is not based on proportionate evidence and fails to justify its spatial strategy. 3. Is the Plan Effective ? The Plan is not effective or deliverable given the known constraints. Major allocations such as West Canvey Island and the Seaview Road corridor lie within flood zones and lack infrastructure to support emergency planning. Pressures on roads and healthcare are acknowledged but not resolved through binding delivery mechanisms. The primary housing site is not shovel-ready and faces significant delivery time constraints.								

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								Water sources. Their ability to provide Space for Water, and in the event of a Tidal Breach to			undermining the Plan’s ability to meet urgent housing needs. Conclusion: The Plan is not deliverable without significant risk to public safety and infrastructure capacity. 4. Consistent with National Policy ? The Plan fails to meet the housing targets set by the Standard Methodology and does not integrate consequence-based planning for flood risk or hazardous installations. This is contrary to NPPF guidance and Planning Practise Guidance on safe development and resilience. Furthermore, the Plan does not reflect legal duties under the Civil Contingencies Act 2004 or COMAH Regulations to plan for foreseeable emergencies. Conclusion: The Plan is inconsistent with national policy and statutory obligations for riskinformed development. In light of the above, we respectfully request that the Castle Point Local Plan 2026–2043 be withdrawn or substantially revised to address the issues raised in this representation. The Plan must be re-evaluated								

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											to ensure it meets the tests of soundness, prioritises public safety, and complies with national policy and legal obligation. Is the Plan Legal ? On the basis that this plan has been constructed by professional planners, we could not consider ourselves qualified to challenge its legality, subsequently we are compelled to respond "YES" to this question. However, this submission sets out to indicate that CPBC draft Reg19 consultation may well prove to be unsound or even illegal, being neither positively prepared nor adequately evidenced. The advice provided at 1.09 and 1.10 of this submission, has not been made lightly and goes some way to support our argument that adopting a wholly no Green Belt development policy, at the expense of public safety is somewhat perverse. Prioritising mainland Green Belt protection without fully accounting for major incident hazard range and the potential for catastrophic flood events on Canvey Island, effectively								

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0219-0003	Individual	Graham	Bracci		Yes	C4	Yes	3.01 The land to the south of Northwick Road has extant consent for employment development but this has been in place for many years due to a technical commencement but has not yet occurred. It appears that CPBC are confident that Housing development may be more forthcoming. This could be seen as being overly optimistic. A Housing development in close proximity to the proposed mixed industrial use development may offer little appeal, or confidence, to a potential new community of flat dwellers / home owners. 3.02 West Canvey is subject to the issues of potential Flood Risk, also the issues emanating from the Hazardous Industries which could potentially affect the rest of Canvey Island and its residents. 3.03 Being close to the sea defence the ground conditions may likely be affected by the high water table, which in itself may be influenced by saline water, indicating tidal water traversing beneath the sea defence could be a constraint on the construction of a Flatted development. Raising	No	Positively Prepared, Effective, Justified, Consistent with National Policy	Summary Statement This representation is submitted in response to the Regulation 19 consultation on the Castle Point Borough Council Local Plan 2026–2043. It is our view that the Plan fails all four tests of soundness as defined in the National Planning Policy Framework (NPPF). The Plan is underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. 1. Is the Plan Positively Prepared ? The Plan is not positively prepared to meet the area’s objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. The Plan selectively identifies flood risk constraints (Footnote 7)		Yes	To introduce and explain any extra specific supporting evidence in relation to the matters raised in this submission during the Examination in Public (EiP)		C	Underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. The NPPF 2024 explicitly removes the ability for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey. The Plan does not seek to meet development needs in a sustainable or safe manner. The primary housing site is not shovel-ready and faces significant delivery time constraints, undermining the Plan’s ability to meet urgent	Canvey Transport and Access The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy ‘A Better Connected Essex’ has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan	N

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								Ground Levels above the threat of Flooding may well impact upon nearby land and property. 3.04 Some of the existing commercial users in the Charfleets area are themselves involved in heavy industrial activities, creating an undesirable area for a Housing development 3.05 The current new retail / commercial area, despite being popular amongst locals is extremely poorly served by public transport. It relies on a high majority of private car users. 3.06 Without significant infrastructure upgrades, environmental mitigation, and a shift in the surrounding land uses, the site risks becoming an isolated, high-cost enclave rather than a thriving community. 3.07 A phased or mixed-use Masterplan that buffers residential areas from heavy industry, integrates green space, and improves transport could make the scheme more viable, however, that would require substantial investment and coordination			and then actively proposes development in those high-risk areas. The NPPF 2024 explicitly removes the ability for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey. Conclusion: The Plan does not seek to meet development needs in a sustainable or safe manner. 2. Is the Plan Justified ? The Plan lacks proportionate evidence and fails to consider reasonable alternatives. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequencebased analysis for vulnerable populations. Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-			process			housing needs. The Plan is not deliverable without significant risk to public safety and infrastructure capacity Without significant infrastructure upgrades, environmental mitigation, and a shift in the surrounding land uses, the site risks becoming an isolated, high-cost enclave rather than a thriving community.		

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											prone areas, without demonstrating that safer alternatives were adequately considered. It fails to identify Canvey Island as a single flood cell requiring open space catchment areas for flood mitigation . Whilst the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey, despite failing to provide the required Level II SFRA Conclusion: The Plan is not based on proportionate evidence and fails to justify its spatial strategy. 3. Is the Plan Effective ? The Plan is not effective or deliverable given the known constraints. Major allocations such as West Canvey Island and the Seaview Road corridor lie within flood zones and lack infrastructure to support emergency planning. Pressures on roads and healthcare are acknowledged but not resolved through binding delivery mechanisms. The primary housing site is not shovel-ready and faces significant delivery time constraints,								

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											undermining the Plan’s ability to meet urgent housing needs. Conclusion: The Plan is not deliverable without significant risk to public safety and infrastructure capacity. 4. Consistent with National Policy ? The Plan fails to meet the housing targets set by the Standard Methodology and does not integrate consequence-based planning for flood risk or hazardous installations. This is contrary to NPPF guidance and Planning Practise Guidance on safe development and resilience. Furthermore, the Plan does not reflect legal duties under the Civil Contingencies Act 2004 or COMAH Regulations to plan for foreseeable emergencies. Conclusion: The Plan is inconsistent with national policy and statutory obligations for riskinformed development. In light of the above, we respectfully request that the Castle Point Local Plan 2026–2043 be withdrawn or substantially revised to address the issues raised in this representation. The Plan must be re-evaluated								

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0219-0004	Individual	Graham	Bracci		Yes	C3	Yes	CPBC Plan Pages 38 – 39 2.01 Insufficient Controls on Activities: There is no clear framework for monitoring or regulating port operations. Policies SD6 (Pollution Control), SD1 (Flood Risk), and SD8 (Hazardous Uses) should be explicitly referenced and integrated into Policy C3 to ensure proper oversight. 2.02 The Port Facility at Canvey Island specifically only facilitates the unloading for storage, forwarding on and bunkering of huge quantities of hazardous materials, these being LPG, oil and fuel-based products, serving the Upper Tier Establishments (upper tier, being a recognition of specified quantities of certain dangerous substances processed or stored, having the potential to cause significant on-site and off-site consequence to employees, the wider members of the public, including the possibility of causing multiple fatalities) of Calor Gas and Oikos. 2.03 The Plan fails to reference or take into account the proposed Oikos Marine & South	No	Positively Prepared, Effective, Justified, Consistent with National Policy	Summary Statement This representation is submitted in response to the Regulation 19 consultation on the Castle Point Borough Council Local Plan 2026–2043. It is our view that the Plan fails all four tests of soundness as defined in the National Planning Policy Framework (NPPF). The Plan is underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. 1. Is the Plan Positively Prepared ? The Plan is not positively prepared to meet the area’s objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. The Plan selectively identifies flood risk constraints (Footnote 7)		Yes	To introduce and explain any extra specific supporting evidence in relation to the matters raised in this submission during the Examination in Public (EiP)		C	Highlights risks at hazardous sites Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-prone areas, without demonstrating that safer alternatives were adequately considered. It fails to identify Canvey Island as a single flood cell requiring open space catchment areas for flood mitigation. The Plan is not based on proportionate evidence and fails to justify its spatial strategy. Furthermore, the Plan does not reflect legal duties under the Civil Contingencies Act 2004 or COMAH	Hazardous installations and port-related activities As set out in Plan paragraph 8.28 ‘Both port facilities are registered as Control of Major Accident Hazards (COMAH) sites due to the hazardous nature of the goods that they receive and store. The Health and Safety Executive (HSE) and the Environment Agency are responsible for regulating activities at these sites, and also provide advice on the level of hazard the installations pose to nearby development. Both installations have HSE consultation zones identified around them, in which it is expected that other development is	Policy Hou5 – Park Homes. 1. New park homes will only be supported on existing Park Home sites as defined on the Policies Map, and subject to compliance with other plan policies Justification: The existing wording may be misinterpreted that intensification of Park Homes is automatically accepta

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								Side Development (Case Ref: TR030004), a live Nationally Significant Infrastructure Project (NSIP) currently in the pre-application phase. 9 Should this application be accepted the resulting outcome would effectively double the storage capacity provided by this establishment. This omission undermines the Local Plan's compliance with the tests of soundness when set against Policy C4 increased societal risk. Calor Gas and Oikos Major Hazards Storage and Distribution Site 2.04 The Castle Point Plan Policy SD8 fails to address the significance of the hazardous sites of Calor Gas and Oikos by not employing the current HSE methodology, despite CPBC being the designated Hazardous Substances Authority. These sites pose significant risks due to the nature of materials handled and their proximity to the existing and proposed increase of residential areas. The absence of a clear direction undermines CPBC's statutory responsibilities and leaves a critical gap in strategic planning, emergency			and then actively proposes development in those high-risk areas. The NPPF 2024 explicitly removes the ability for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey. Conclusion: The Plan does not seek to meet development needs in a sustainable or safe manner. 2. Is the Plan Justified ? The Plan lacks proportionate evidence and fails to consider reasonable alternatives. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequencebased analysis for vulnerable populations. Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-			process			Regulations to plan for foreseeable emergencies. The Plan does not integrate consequence-based planning for flood risk or hazardous installations.	controlled to limit unnecessary harm to life and property. The extent of these zones is determined by the nature of the goods received and stored on site, and the technical measures employed to ensure safety at the sites. It is therefore possible that the level of hazard posed to other developments nearby can be reduced, both by limiting development nearby, and also by seeking improvements to the level of hazard posed by these sites, both during normal management and maintenance, and also at the point where new development is proposed' The current HSE consultation zones are	ble in principle . Noting that park home sites exist within areas of serious constraint such as the consultation zone for hazardous installations (Policy SD8), FZ3, etc.

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								preparedness, and community safety. 2.05 The description of these being Hazardous Sites somewhat discredits their potential to do harm. These are in fact Major Hazardous Sites categorised as “UPPER TIER ESTABLISHMENTS” described as follows. Establishments 2.06 The term “Establishment” generally relates to the whole location under the control of an operator whose activities involve installations handling specified dangerous substances, present in specified quantities. Installation 2.07 The term “Installation” generally means a technical unit within an “Establishment” whether at or below ground level, in which dangerous substances are produced, used, handled or stored and includes all equipment, structures, pipelines, machinery, tools, private railways sidings, docks, unloading quays serving the installation, jetties, warehouse or similar structures, floating or otherwise necessary for the operation of that installation			prone areas, without demonstrating that safer alternatives were adequately considered. It fails to identify Canvey Island as a single flood cell requiring open space catchment areas for flood mitigation Whilst the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey, despite failing to provide the required Level II SFRA Conclusion: The Plan is not based on proportionate evidence and fails to justify its spatial strategy. 3. Is the Plan Effective ? The Plan is not effective or deliverable given the known constraints. Major allocations such as West Canvey Island and the Seaview Road corridor lie within flood zones and lack infrastructure to support emergency planning. Pressures on roads and healthcare are acknowledged but not resolved through binding delivery mechanisms. The primary housing site is not shovel-ready and faces significant delivery time constraints,								indicated on the policies map. The plan doesn’t propose any new housing allocations in the HSE consultation zone. However, some existing residential areas are already within the zone, as well as the Thorney Bay Park Homes site. Policy SD8 ‘Development near Hazardous Uses’ states that ‘Development proposals will be assessed in accordance with the Health and Safety Executive (HSE) Guidance where they fall within a consultation zone for one or more hazardous installations. Where the HSE advises against development the planning application will be refused on health and safety grounds’. Needs of	

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								Domino Effect. 2.08 The proximity of the “Establishments of Oikos and Calor and their Installations,” could be the source of, or increase the risk or consequences, of a major accident and of domino effects. Off-Site Hazard Range Major Accident Consequence Analysis. 2.09 Many things can go wrong at major hazardous sites and despite the risk being maintained to, as low as reasonably practicable, residual risk remains. The serious consequences of unconfined vapour cloud explosions, flash fires, and BLEVEs are very well known. Undertaking “Off-Site Hazard Range Consequence Analysis” provides CPBC with a better understanding of impact distance consequence emanating from major accidents. 10 2.10 Given the above, it is imperative that CPBC’s Plan establishes meaningful Major Hazardous Site Local Policies that support objectives preventing major accidents and limiting the off-site consequences of such accidents for human health, safety and			undermining the Plan’s ability to meet urgent housing needs. Conclusion: The Plan is not deliverable without significant risk to public safety and infrastructure capacity. 4. Consistent with National Policy ? The Plan fails to meet the housing targets set by the Standard Methodology and does not integrate consequence-based planning for flood risk or hazardous installations. This is contrary to NPPF guidance and Planning Practise Guidance on safe development and resilience. Furthermore, the Plan does not reflect legal duties under the Civil Contingencies Act 2004 or COMAH Regulations to plan for foreseeable emergencies. Conclusion: The Plan is inconsistent with national policy and statutory obligations for riskinformed development. In light of the above, we respectfully request that the Castle Point Local Plan 2026–2043 be withdrawn or substantially revised to address the issues raised in this representation. The Plan must be re-evaluated								emergency services considered in the supporting Infrastructure Delivery Plan (IDP). The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/	

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								the environment. Such policies, informed by the information provided by Upper Tier Establishments Safety Reports, specifically to assist with incumbent Off-Site Emergency and Land-Use-Planning.			to ensure it meets the tests of soundness, prioritises public safety, and complies with national policy and legal obligation. Is the Plan Legal ? On the basis that this plan has been constructed by professional planners, we could not consider ourselves qualified to challenge its legality, subsequently we are compelled to respond "YES" to this question. However, this submission sets out to indicate that CPBC draft Reg19 consultation may well prove to be unsound or even illegal, being neither positively prepared nor adequately evidenced. The advice provided at 1.09 and 1.10 of this submission, has not been made lightly and goes some way to support our argument that adopting a wholly no Green Belt development policy, at the expense of public safety is somewhat perverse. Prioritising mainland Green Belt protection without fully accounting for major incident hazard range and the potential for catastrophic flood events on Canvey Island, effectively								

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0219-0005	Individual	Graham	Bracci		Yes	GB1	Yes	CPBC Plan Page 126 5.01 We welcome and support the CPBC Plan's desire to protect the Borough's Green Belt. However we are most concerned at some of the findings contained in the Castle Point Green Belt Assessment. 5.02 The broader functions of the Canvey Island Green Belt, beyond the official Purposes, have received little importance and weight. It is apparent that the CPBC Plan indicates little enough weight given to assets included within areas GB1, GB2 and GB3. 5.03 We consider that the latest CPBC Green Belt Assessment is wrong to indicate that Parcels GB1 and GB2 in particular, should be identified as potential Grey Belt. Both Parcels meet the PPG criteria to remain as Green Belt. 5.04 Annex 2 of the NPPF defines Grey Belt Land, as land in the Green Belt comprising previously developed land and/or any other land that does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143 of the NPPF. 5.05 Quite clearly GB1 and GB2, Very Strongly	No	Positively Prepared, Effective, Justified, Consistent with National Policy	Summary Statement This representation is submitted in response to the Regulation 19 consultation on the Castle Point Borough Council Local Plan 2026–2043. It is our view that the Plan fails all four tests of soundness as defined in the National Planning Policy Framework (NPPF). The Plan is underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. 1. Is the Plan Positively Prepared ? The Plan is not positively prepared to meet the area's objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. The Plan selectively identifies flood risk constraints (Footnote 7)		Yes	To introduce and explain any extra specific supporting evidence in relation to the matters raised in this submission during the Examination in Public (EiP)		C	The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. Welcome and support the CPBC Plan's desire to protect the Borough's Green Belt. However we are most concerned at some of the findings contained in the Castle Point Green Belt Assessment. The broader functions of the Green Belt, beyond the official Purposes, have received little importance and weight	Green Belt/Grey belt covered under policy GB2. Non-Green Belt factors in relation to these sites are considered in the SLAA and SA. The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point,	N

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								contribute to Purpose a) to check the unrestricted sprawl of large built-up areas; Canvey Island being the most densely populated area within Castle Point. 5.06 Besides this, GB1, GB2 and GB3 all contribute to Purpose e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. As indicated by the CPBC Plan's development proposals for Canvey Island. 5.07 Furthermore, these parcels fall within the protections of Footnote 7. Parcel GB1 containing the Dutch Cottage a Listed Building. Parcel GB2 directly abutting a now rare Roman Saltern, a Scheduled Monument, of which Historic England note that in Essex, only a very small number remain. 11 GB2 with a strong boundary at the Southern and Eastern edges marked by the Hill Hall Dyke, a designated Main River. 12 5.08 GB1, GB2 and GB3 all fall within Tidal Flood Zone 3. Within a particularly vulnerable Area, reliant on the Tidal Barriers giving sole protection from Flooding, due to there being a			and then actively proposes development in those high-risk areas. The NPPF 2024 explicitly removes the ability for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey. Conclusion: The Plan does not seek to meet development needs in a sustainable or safe manner. 2. Is the Plan Justified ? The Plan lacks proportionate evidence and fails to consider reasonable alternatives. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequencebased analysis for vulnerable populations. Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-			process				Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an	

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								lack of sea wall defence alongside the Benfleet Station area, and the vulnerable clay banking sea defence alongside the RSPB land. 5.09 Development within any of these areas should constitute inappropriate development and amount to, reason enough to remain within the Green Belt Boundary and not to be considered Grey Belt. 5.10 We are concerned that these parcels have received a strategic re-branding, GB1, GB2 and GB3. During previous CPBC attempts at Plan-making they have been numbered Area 23 and Area 26. It is reasonable to consider that there may well be a specific reason to draw these areas to prominence within the Borough’s Green Belt parcels, to which we can only conclude what the CPBC Core Strategy Examining Inspector Mr P.Crysell identified as“Local Factors,”remains active and relevant today. Building any housing in flood zone 3, without at least first looking at alternatives, sequentially outside of these high risk areas (in addition to the Comah			prone areas, without demonstrating that safer alternatives were adequately considered. It fails to identify Canvey Island as a single flood cell requiring open space catchment areas for flood mitigation . Whilst the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey, despite failing to provide the required Level II SFRA Conclusion: The Plan is not based on proportionate evidence and fails to justify its spatial strategy. 3. Is the Plan Effective ? The Plan is not effective or deliverable given the known constraints. Major allocations such as West Canvey Island and the Seaview Road corridor lie within flood zones and lack infrastructure to support emergency planning. Pressures on roads and healthcare are acknowledged but not resolved through binding delivery mechanisms. The primary housing site is not shovel-ready and faces significant delivery time constraints.								appropriate development site for those reasons set out above. 2018 Green Belt Assessments still form part of the evidence and considered wider areas.	

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								sites) is indeed unreasonable, having already identified Canvey Island Brownfield spaces for Housing.			undermining the Plan’s ability to meet urgent housing needs. Conclusion: The Plan is not deliverable without significant risk to public safety and infrastructure capacity. 4. Consistent with National Policy ? The Plan fails to meet the housing targets set by the Standard Methodology and does not integrate consequence-based planning for flood risk or hazardous installations. This is contrary to NPPF guidance and Planning Practise Guidance on safe development and resilience. Furthermore, the Plan does not reflect legal duties under the Civil Contingencies Act 2004 or COMAH Regulations to plan for foreseeable emergencies. Conclusion: The Plan is inconsistent with national policy and statutory obligations for riskinformed development. In light of the above, we respectfully request that the Castle Point Local Plan 2026–2043 be withdrawn or substantially revised to address the issues raised in this representation. The Plan must be re-evaluated								

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0219-0006	Individual	Graham	Bracci		Yes	C7	Yes	CPBC Plan Page 46 4.01 Extract from the 6-Point Plan for Canvey Island, concerning Canvey Lake. “The Section 19 Flood Investigation Report, published by Essex LLFA in September 2014, recommended a thorough investigation into the capacity available in the Canvey Lake. The lake, strategically located in the centre of the Island, forms part of the Island’s surface water drainage system and so ensuring it is kept in a good condition and able to receive surface water during storm events is vital.” 4.02 More Importantly; “In a further report by the government’s Chief Scientist, Sir Mark Walport, it was also mentioned that capacity of this lake needed to be addressed and maintained.” 4.03 “The MAP has completed the first phase of modeling the impacts of dredging the lake, to remove large amounts of silt which have built up over time. The group has also suggested re-profiling the banks of the lake, to provide additional storage capacity in high intensity	No	Positively Prepared, Effective, Justified, Consistent with National Policy	Summary Statement This representation is submitted in response to the Regulation 19 consultation on the Castle Point Borough Council Local Plan 2026–2043. It is our view that the Plan fails all four tests of soundness as defined in the National Planning Policy Framework (NPPF). The Plan is underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. 1. Is the Plan Positively Prepared ? The Plan is not positively prepared to meet the area’s objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. The Plan selectively identifies flood risk constraints (Footnote 7)		Yes	To introduce and explain any extra specific supporting evidence in relation to the matters raised in this submission during the Examination in Public (EiP)		C	No works have been done on Canvey Lake in 10 years despite the 6 point plan	Comments noted. The purpose of Policy C7 is to improve the space as a multifunctional green space and include a long term management plan to ensure its upkeep is maintained	N

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								rainfall events. This increased storage capacity could allow surface water to drain away from the network more effectively, whilst increasing the amount of water that could be held. It has been identified that any work on the lake would need to be followed by a regular planned maintenance programme.” 4.04 Canvey Lake is clearly one of the main assets within the Canvey Island surface water drainage system. Despite this and the findings of the government’s Chief Scientist, Sir Mark Walport’s, and the 6–Point Plan recognition, that it is “vital” for the Lake to be kept in good condition to perform its strategic function during storm events, no major work, nor maintenance, on the Lake has been undertaken, in the 10 years since the 2014 Summer Floods.			and then actively proposes development in those high-risk areas. The NPPF 2024 explicitly removes the ability for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey. Conclusion: The Plan does not seek to meet development needs in a sustainable or safe manner. 2. Is the Plan Justified ? The Plan lacks proportionate evidence and fails to consider reasonable alternatives. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequencebased analysis for vulnerable populations. Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-			process					

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0220-0001	Individual	Steve	Sawkins		Yes	SP3	Yes	1.01 Canvey Island is the most Densely Populated and Deprived part of Castle Point. Despite its social challenges and constrained infrastructure, it hosts 2 Top Tier COMAH sites, in very close proximity to the Residential neighbourhoods. These sites pose risks of catastrophic incidents due to mechanical failure, human error, or external threats. Increasing residential density near such installations elevates the potential consequences of a major incident. The COMAH regulations and associated Hazard Ranges are designed to limit exposure—not expand it. The juxtaposition of high-density housing with high-risk industrial infrastructure is antithetical to sustainable land-use planning. 1.02 Canvey Island is at, or just below Sea Level apart from a small area known as Canvey Heights. It is designated a Flood Zone 3A area. Whilst it has Sea Defences, it remains at Residual and Actual Risk of Tidal Flooding, a substantial planning issue. With the rising sea level, due to climate	No	Positively Prepared, Effective, Justified, Consistent with National Policy	Summary Statement This representation is submitted in response to the Regulation 19 consultation on the Castle Point Borough Council Local Plan 2026–2043. It is our view that the Plan fails all four tests of soundness as defined in the National Planning Policy Framework (NPPF). The Plan is underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. 1. Is the Plan Positively Prepared ? The Plan is not positively prepared to meet the area’s objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. The Plan selectively identifies flood risk constraints (Footnote 7)		Yes	To introduce and explain any extra specific supporting evidence in relation to the matters raised in this submission during the Examination in Public (EiP)		C	Does not meet the area’s objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The Plan lacks proportionate evidence and fails to consider reasonable alternatives The Plan is not effective or deliverable given the known constraints. Major allocations such as West Canvey Island and the Seaview Road corridor lie within flood zones and lack infrastructure to support emergency planning. Pressures on roads and healthcare are acknowledged but not resolved through binding delivery mechanisms.	Noted	N

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								change, the protection afforded by these existing defences is decreasing, and is likely to fall below current target levels within the lifetime of any new developments. 1.03 Indicative flood defence raising requirements are as follows: • About 0.3m in 2040 (to a level of 6.7m AOD) • A further 1.4m in 2070 (to a level of 8.1m AOD) These increases depend on the rate of sea level rise. 1 1.04 These aspirational new raised sea defences may actually harm the sustainability of Canvey Island as a desirable location to live. “Whilst hard defences could potentially be raised within existing footprints, the structures would be tall, unattractive and restrict public access.” 2 1.05 Castle Point Borough Council, within Planning Matters suggest, as a general approach that “the continued development of Canvey Island is necessary to sustain the local community and prevent the social and economic blight of the settlement”. 3 1.06 However, this claim overlooks the NPPF			and then actively proposes development in those high-risk areas. The NPPF 2024 explicitly removes the ability for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey. Conclusion: The Plan does not seek to meet development needs in a sustainable or safe manner. 2. Is the Plan Justified ? The Plan lacks proportionate evidence and fails to consider reasonable alternatives. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequencebased analysis for vulnerable populations. Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-			process			The Plan fails to meet the housing targets set by the Standard Methodology		

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								requirement to avoid new housing in highconsequence flood zones unless there are no reasonably available lower-risk sites. Being such a small Borough, it is difficult to suggest that there are no more suitable sites in the near vicinity in lower Flood Risk Zones. 1.07 To claim that housing development improves “sustainability” in this context ignores the fundamental principle of avoiding development in high-consequence flood zones, as emphasised in the NPPF and Strategic Flood Risk Assessments. 1.08 True sustainability involves balancing environmental constraints, social well-being, and economic viability. Adding residential housing in a location with constrained evacuation routes, ageing infrastructure, and limited resilience planning, does not meet this balance. This does not comply with the NPPF’s Sequential Approach to Strategic Development Site Selection. 1.09 We are mindful of Castle Point Borough Council own officers advice to Councillors;			prone areas, without demonstrating that safer alternatives were adequately considered. It fails to identify Canvey Island as a single flood cell requiring open space catchment areas for flood mitigation . Whilst the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey, despite failing to provide the required Level II SFRA Conclusion: The Plan is not based on proportionate evidence and fails to justify its spatial strategy. 3. Is the Plan Effective ? The Plan is not effective or deliverable given the known constraints. Major allocations such as West Canvey Island and the Seaview Road corridor lie within flood zones and lack infrastructure to support emergency planning. Pressures on roads and healthcare are acknowledged but not resolved through binding delivery mechanisms. The primary housing site is not shovel-ready and faces significant delivery time constraints,								

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								“Given the risk to the population, various measures are required to deal with the concerns to human health and wellbeing. These include: • The need for an emergency plan to be in place; • The need for sea defences to be maintained and improved; • The need to maintain the population living in the flood risk zone at current levels or lower;” (My emphasis) 4 1.10 Also, Advice to CPBC, contained in the current Strategic Flood Risk Assessment Level1 “Recommendation 4-2 CPBC should pursue opportunities to move existing development from within the floodplain to areas with a lower risk of flooding.” (My emphasis) 1.11 To propose a Mixed Use Development at West Canvey will necessitate the use of Green Land, an area which, alongside other green areas, fulfilled an essential flood prevention purpose for nearby land during the Canvey Island 2014 Summer Flooding. Plus it will increase the Population at Risk of Flooding and a Hazardous Industry			undermining the Plan’s ability to meet urgent housing needs. Conclusion: The Plan is not deliverable without significant risk to public safety and infrastructure capacity. 4. Consistent with National Policy ? The Plan fails to meet the housing targets set by the Standard Methodology and does not integrate consequence-based planning for flood risk or hazardous installations. This is contrary to NPPF guidance and Planning Practise Guidance on safe development and resilience. Furthermore, the Plan does not reflect legal duties under the Civil Contingencies Act 2004 or COMAH Regulations to plan for foreseeable emergencies. Conclusion: The Plan is inconsistent with national policy and statutory obligations for riskinformed development. In light of the above, we respectfully request that the Castle Point Local Plan 2026–2043 be withdrawn or substantially revised to address the issues raised in this representation. The Plan must be re-evaluated								

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								incident. 1.12 Essex County Council produced a 41 page Flood Investigation Report, into the “Canvey Island 2014 Summer Flood.” 5 This document was highly informative of the devastation caused and the shortcomings and failures of the various infrastructure and agencies, during the event. 1.13 Following this the “Canvey Island 6-Point Plan” 6 was produced to attempt to raise Government assistance in Funding. “The cost of a future flooding incident on the Island would be in the region of £274m per year in lost economic output, and up to £2.1bn in damage to residential property.” “Unless a strategic and wide reaching flood mitigation programme can be implemented, site based flood mitigation could be seen by developers as too expensive and fragmented.”” In order to deliver this vital plan, all relevant agencies and central government need to work together and address the £24.5m funding shortfall.” 1.14 The approach to Government found that a			to ensure it meets the tests of soundness, prioritises public safety, and complies with national policy and legal obligation. Is the Plan Legal ? On the basis that this plan has been constructed by professional planners, we could not consider ourselves qualified to challenge its legality, subsequently we are compelled to respond "YES" to this question. However, this submission sets out to indicate that CPBC draft Reg19 consultation may well prove to be unsound or even illegal, being neither positively prepared nor adequately evidenced. The advice provided at 1.09 and 1.10 of this submission, has not been made lightly and goes some way to support our argument that adopting a wholly no Green Belt development policy, at the expense of public safety is somewhat perverse. Prioritising mainland Green Belt protection without fully accounting for major incident hazard range and the potential for catastrophic flood events on Canvey Island, effectively								

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								detailed account of funding expenditure was required to proceed to consideration, and we are led to believe that is where the effort was left. 1.15 Initially, following the 2013 and 2014 Canvey Flooding, work was undertaken on the mapping of the Canvey Integrated Urban Drainage System, Drainage repairs, and Road drainage infrastructure maintenance undertaken. Unfortunately the regularity of these services receive inadequate finances, and rather than the promised more regular maintenance, they now receive less. 1.16 We are now informed that the Urban Greening Scenario Testing on Canvey Island would not produce a significant impact on Flood Risk. 7 1.17 We are also mindful of the Examining Inspector’s Letter of Advice to Castle Point Council, during the very first attempt to produce a CPBC Plan; “I have reservations about the methodology employed and the way in which it appears to have been used, leading to inconsistent and inappropriate site			subdividing the borough’s communities, may make the draft CPBC Plan be deemed not only unreasonable but also unprincipled and corporately illogical.									

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								selection. For example, the Council’s own Sustainability Appraisal is unclear as to why the most sustainable Green Belt site was discounted. I therefore consider the Council needs to revisit its assessment of Green Belt locations paying particular regard to the five purposes of the Green Belt as set out in PPG2. I accept that other considerations will also influence the choice of sites but potential locations should not be dismissed because local factors are given too much weight. This appears to have happened previously. The Council’s desire to protect its Green Belt areas is understandable but its approach has also had a considerable bearing on the overall distribution of growth promoted in the Core Strategy. In this respect, I consider it would be difficult to endorse a strategy which commits to Green Belt release in an area of potential high flood risk at Canvey Island yet fails to identify more than a token amount of land on the mainland where flooding is not a significant issue. While I accept some											

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								development at Canvey Island may be required to meet local needs and to support services, I am not convinced that maintaining the current distribution of development across the Borough is justified given the existing constraints.” 8 1.18 Rather than developing more housing at a rate that will inevitably increase the numbers of population of Canvey Island at Risk of Flooding and / or a Hazardous Industrial Incident, caution should be applied and Development should be planned-for in a limited fashion by means of Regeneration. Thus providing work for the local Building Industry. 1.19 In these circumstances there is no place for the “Local Factors” previously recognised by Planning Inspector Mr P.Crysell, see above, to remain an influence on the skewed Housing Development Distribution contained within this latest version of the CPBC Plan. 1.20 Whilst this approach may be considered radical, we consider it essential that the											

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								Population level of Canvey Island be maintained at the same level, or lower, and that the Constraints indicated within the NPPF are justly applied for the benefits of the Health, Safety and Well-being of all Canvey Islanders. The Regeneration of Brownfield land should be the approach to enable Sustainable Development for Canvey Island.											

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0220-0002	Individual	Steve	Sawkins		Yes	SD1		CPBC Plan Page 170 6.01 In the further interest of public safety, there needs to be a realisation that Canvey Island is at risk of being inundated by the sea. Subsequently there needs to be a “Flood Risk Consequence Analysis” undertaken that evaluates the consequences, on the population living and working at or below sea level, following a major breach, or over-topping of its Sea Defences. 6.02 Policy SD1 rightly identifies Canvey Island as being at high risk of tidal flooding and sets out principles to avoid development in Flood Zone 3. However, Policy C4 proposes considerable development in West Canvey, which lies within this zone. This contradiction undermines the credibility of the Plan and raises concerns about the safety and sustainability of future development 6.03 Castle Point Borough Council continues to wrongly report / imply that the funding for Canvey Island’s Sea defence improvements has been secured. The Environment Agency via, its TE2100 plan, aspires to	No	Positively Prepared, Effective, Justified, Consistent with National Policy	Summary Statement This representation is submitted in response to the Regulation 19 consultation on the Castle Point Borough Council Local Plan 2026–2043. It is our view that the Plan fails all four tests of soundness as defined in the National Planning Policy Framework (NPPF). The Plan is underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. 1. Is the Plan Positively Prepared ? The Plan is not positively prepared to meet the area’s objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. The Plan selectively identifies flood risk constraints (Footnote 7)		Yes	To introduce and explain any extra specific supporting evidence in relation to the matters raised in this submission during the Examination in Public (EiP)		C	The Plan selectively identifies flood risk constraints (Footnote 7) and then actively proposes development in those high-risk areas. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequence based analysis for vulnerable populations.	Flooding Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SuDS Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 'Proposals must demonstrate how the SuDS feature(s) reflect and respond to the constraints of the specific geographic location , site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council’s SuDS Design

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								maintain and improve the present level of protection, in respect of rise in sea levels consistent with global warming predictions. However, the Environment Agency strongly emphasises that such improvements are subjected to funding and costeffectiveness. Without such improvements Canvey Island may become unsustainable as a settlement. 6.04 There has been extensive works undertaken via Strategic Flood Risk Assessments giving timescale, velocity and depths of sea inundation at several locations across Canvey Island. However, such works have failed to provide any indication as to the type and number of the population that would be engulfed within these inundation events. 6.05 With this in mind, we remain concerned by the methodology employed by Castle Point Borough Council in their application of the Sequential Test regarding development on Canvey Island. The Urban development only policy, effectively removes extensive option for			and then actively proposes development in those high-risk areas. The NPPF 2024 explicitly removes the ability for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey. Conclusion: The Plan does not seek to meet development needs in a sustainable or safe manner. 2. Is the Plan Justified ? The Plan lacks proportionate evidence and fails to consider reasonable alternatives. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequencebased analysis for vulnerable populations. Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-			process										Guide for Essex, the Castle Point Strategic Flood Risk Assessment (SFRA) and recommendations/advice from statutory bodies (including EA, Essex LLFA).'

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								sequentially testing alternative sites at other areas of the borough. 6.06 Given the extremely problematic logistical access and egress issues when planning for a breach of defended locations on Canvey Island, 14 it is imperative that where it may be intended to increase the numbers at risk or consequences of inundation, that site selection is informed by the findings of a "Major Breach of Sea Defence Consequence Analysis" 6.07 The overlapping of survey maps, imaging the landscape of the borough likely to be encompassed by such potential incidents, will provide a reasonable indication of the likely make up and numbers of the population and the severity of injuries 15 In doing so assisting CPBC with the undertaking of the duties placed upon them via the Civil Contingency Act. 6.08 Regarding Canvey Island’s Green Belt and Green Field spaces, we consider these areas valuable and essential assets when considering Flood Risk, whether from Tidal or Surface			prone areas, without demonstrating that safer alternatives were adequately considered. It fails to identify Canvey Island as a single flood cell requiring open space catchment areas for flood mitigation Whilst the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey, despite failing to provide the required Level II SFRA Conclusion: The Plan is not based on proportionate evidence and fails to justify its spatial strategy. 3. Is the Plan Effective ? The Plan is not effective or deliverable given the known constraints. Major allocations such as West Canvey Island and the Seaview Road corridor lie within flood zones and lack infrastructure to support emergency planning. Pressures on roads and healthcare are acknowledged but not resolved through binding delivery mechanisms. The primary housing site is not shovel-ready and faces significant delivery time constraints.								

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								Water sources. Their ability to provide Space for Water, and in the event of a Tidal Breach to			undermining the Plan’s ability to meet urgent housing needs. Conclusion: The Plan is not deliverable without significant risk to public safety and infrastructure capacity. 4. Consistent with National Policy ? The Plan fails to meet the housing targets set by the Standard Methodology and does not integrate consequence-based planning for flood risk or hazardous installations. This is contrary to NPPF guidance and Planning Practise Guidance on safe development and resilience. Furthermore, the Plan does not reflect legal duties under the Civil Contingencies Act 2004 or COMAH Regulations to plan for foreseeable emergencies. Conclusion: The Plan is inconsistent with national policy and statutory obligations for riskinformed development. In light of the above, we respectfully request that the Castle Point Local Plan 2026–2043 be withdrawn or substantially revised to address the issues raised in this representation. The Plan must be re-evaluated								

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0220-0003	Individual	Steve	Sawkins		Yes	C4		3.01 The land to the south of Northwick Road has extant consent for employment development but this has been in place for many years due to a technical commencement but has not yet occurred. It appears that CPBC are confident that Housing development may be more forthcoming. This could be seen as being overly optimistic. A Housing development in close proximity to the proposed mixed industrial use development may offer little appeal, or confidence, to a potential new community of flat dwellers / home owners. 3.02 West Canvey is subject to the issues of potential Flood Risk, also the issues emanating from the Hazardous Industries which could potentially affect the rest of Canvey Island and its residents. 3.03 Being close to the sea defence the ground conditions may likely be affected by the high water table, which in itself may be influenced by saline water, indicating tidal water traversing beneath the sea defence could be a constraint on the construction of a Flatted development. Raising	No	Positively Prepared, Effective, Justified, Consistent with National Policy	Summary Statement This representation is submitted in response to the Regulation 19 consultation on the Castle Point Borough Council Local Plan 2026–2043. It is our view that the Plan fails all four tests of soundness as defined in the National Planning Policy Framework (NPPF). The Plan is underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. 1. Is the Plan Positively Prepared ? The Plan is not positively prepared to meet the area’s objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. The Plan selectively identifies flood risk constraints (Footnote 7)		Yes	To introduce and explain any extra specific supporting evidence in relation to the matters raised in this submission during the Examination in Public (EiP)		C	Underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. The NPPF 2024 explicitly removes the ability for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey. The Plan does not seek to meet development needs in a sustainable or safe manner. The primary housing site is not shovel-ready and faces significant delivery time constraints, undermining the Plan’s ability to meet urgent	Canvey Transport and Access The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy ‘ A Better Connected Essex’ has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan	N

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								Ground Levels above the threat of Flooding may well impact upon nearby land and property. 3.04 Some of the existing commercial users in the Charfleets area are themselves involved in heavy industrial activities, creating an undesirable area for a Housing development 3.05 The current new retail / commercial area, despite being popular amongst locals is extremely poorly served by public transport. It relies on a high majority of private car users. 3.06 Without significant infrastructure upgrades, environmental mitigation, and a shift in the surrounding land uses, the site risks becoming an isolated, high-cost enclave rather than a thriving community. 3.07 A phased or mixed-use Masterplan that buffers residential areas from heavy industry, integrates green space, and improves transport could make the scheme more viable, however, that would require substantial investment and coordination			and then actively proposes development in those high-risk areas. The NPPF 2024 explicitly removes the ability for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey. Conclusion: The Plan does not seek to meet development needs in a sustainable or safe manner. 2. Is the Plan Justified ? The Plan lacks proportionate evidence and fails to consider reasonable alternatives. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequencebased analysis for vulnerable populations. Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-			process			housing needs. The Plan is not deliverable without significant risk to public safety and infrastructure capacity Without significant infrastructure upgrades, environmental mitigation, and a shift in the surrounding land uses, the site risks becoming an isolated, high-cost enclave rather than a thriving community.		

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0220-0004	Individual	Steve	Sawkins		Yes	C3		CPBC Plan Pages 38 – 39 2.01 Insufficient Controls on Activities: There is no clear framework for monitoring or regulating port operations. Policies SD6 (Pollution Control), SD1 (Flood Risk), and SD8 (Hazardous Uses) should be explicitly referenced and integrated into Policy C3 to ensure proper oversight. 2.02 The Port Facility at Canvey Island specifically only facilitates the unloading for storage, forwarding on and bunkering of huge quantities of hazardous materials, these being LPG, oil and fuel-based products, serving the Upper Tier Establishments (upper tier, being a recognition of specified quantities of certain dangerous substances processed or stored, having the potential to cause significant on-site and off-site consequence to employees, the wider members of the public, including the possibility of causing multiple fatalities) of Calor Gas and Oikos. 2.03 The Plan fails to reference or take into account the proposed Oikos Marine & South	No	Positively Prepared, Effective, Justified, Consistent with National Policy	Summary Statement This representation is submitted in response to the Regulation 19 consultation on the Castle Point Borough Council Local Plan 2026–2043. It is our view that the Plan fails all four tests of soundness as defined in the National Planning Policy Framework (NPPF). The Plan is underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. 1. Is the Plan Positively Prepared ? The Plan is not positively prepared to meet the area’s objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. The Plan selectively identifies flood risk constraints (Footnote 7)		Yes	To introduce and explain any extra specific supporting evidence in relation to the matters raised in this submission during the Examination in Public (EiP)		C	Highlights risks at hazardous sites Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-prone areas, without demonstrating that safer alternatives were adequately considered. It fails to identify Canvey Island as a single flood cell requiring open space catchment areas for flood mitigation. The Plan is not based on proportionate evidence and fails to justify its spatial strategy. Furthermore, the Plan does not reflect legal duties under the Civil Contingencies Act 2004 or COMAH	Hazardous installations and port-related activities As set out in Plan paragraph 8.28 ‘Both port facilities are registered as Control of Major Accident Hazards (COMAH) sites due to the hazardous nature of the goods that they receive and store. The Health and Safety Executive (HSE) and the Environment Agency are responsible for regulating activities at these sites, and also provide advice on the level of hazard the installations pose to nearby development. Both installations have HSE consultation zones identified around them, in which it is expected that other development is	Policy Hou5 – Park Homes. 1. New park homes will only be supported on existing Park Home sites as defined on the Policies Map, and subject to compliance with other plan policies Justification: The existing wording may be misinterpreted that intensification of Park Homes is automatically accepta

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								Side Development (Case Ref: TR030004), a live Nationally Significant Infrastructure Project (NSIP) currently in the pre-application phase. 9 Should this application be accepted the resulting outcome would effectively double the storage capacity provided by this establishment. This omission undermines the Local Plan's compliance with the tests of soundness when set against Policy C4 increased societal risk. Calor Gas and Oikos Major Hazards Storage and Distribution Site 2.04 The Castle Point Plan Policy SD8 fails to address the significance of the hazardous sites of Calor Gas and Oikos by not employing the current HSE methodology, despite CPBC being the designated Hazardous Substances Authority. These sites pose significant risks due to the nature of materials handled and their proximity to the existing and proposed increase of residential areas. The absence of a clear direction undermines CPBC's statutory responsibilities and leaves a critical gap in strategic planning, emergency			and then actively proposes development in those high-risk areas. The NPPF 2024 explicitly removes the ability for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey. Conclusion: The Plan does not seek to meet development needs in a sustainable or safe manner. 2. Is the Plan Justified ? The Plan lacks proportionate evidence and fails to consider reasonable alternatives. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequencebased analysis for vulnerable populations. Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-			process			Regulations to plan for foreseeable emergencies. The Plan does not integrate consequence-based planning for flood risk or hazardous installations.	controlled to limit unnecessary harm to life and property. The extent of these zones is determined by the nature of the goods received and stored on site, and the technical measures employed to ensure safety at the sites. It is therefore possible that the level of hazard posed to other developments nearby can be reduced, both by limiting development nearby, and also by seeking improvements to the level of hazard posed by these sites, both during normal management and maintenance, and also at the point where new development is proposed' The current HSE consultation zones are	ble in principle . Noting that park home sites exist within areas of serious constraint such as the consultation zone for hazardous installations (Policy SD8), FZ3, etc.

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								preparedness, and community safety. 2.05 The description of these being Hazardous Sites somewhat discredits their potential to do harm. These are in fact Major Hazardous Sites categorised as “UPPER TIER ESTABLISHMENTS” described as follows. Establishments 2.06 The term “Establishment” generally relates to the whole location under the control of an operator whose activities involve installations handling specified dangerous substances, present in specified quantities. Installation 2.07 The term “Installation” generally means a technical unit within an “Establishment” whether at or below ground level, in which dangerous substances are produced, used, handled or stored and includes all equipment, structures, pipelines, machinery, tools, private railways sidings, docks, unloading quays serving the installation, jetties, warehouse or similar structures, floating or otherwise necessary for the operation of that installation			prone areas, without demonstrating that safer alternatives were adequately considered. It fails to identify Canvey Island as a single flood cell requiring open space catchment areas for flood mitigation . Whilst the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey, despite failing to provide the required Level II SFRA Conclusion: The Plan is not based on proportionate evidence and fails to justify its spatial strategy. 3. Is the Plan Effective ? The Plan is not effective or deliverable given the known constraints. Major allocations such as West Canvey Island and the Seaview Road corridor lie within flood zones and lack infrastructure to support emergency planning. Pressures on roads and healthcare are acknowledged but not resolved through binding delivery mechanisms. The primary housing site is not shovel-ready and faces significant delivery time constraints,											indicated on the policies map. The plan doesn’t propose any new housing allocations in the HSE consultation zone. However, some existing residential areas are already within the zone, as well as the Thorney Bay Park Homes site. Policy SD8 ‘Development near Hazardous Uses’ states that ‘Development proposals will be assessed in accordance with the Health and Safety Executive (HSE) Guidance where they fall within a consultation zone for one or more hazardous installations. Where the HSE advises against development the planning application will be refused on health and safety grounds’. Needs of	

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								Domino Effect. 2.08 The proximity of the “Establishments of Oikos and Calor and their Installations,” could be the source of, or increase the risk or consequences, of a major accident and of domino effects. Off-Site Hazard Range Major Accident Consequence Analysis. 2.09 Many things can go wrong at major hazardous sites and despite the risk being maintained to, as low as reasonably practicable, residual risk remains. The serious consequences of unconfined vapour cloud explosions, flash fires, and BLEVEs are very well known. Undertaking “Off-Site Hazard Range Consequence Analysis” provides CPBC with a better understanding of impact distance consequence emanating from major accidents. 10 2.10 Given the above, it is imperative that CPBC’s Plan establishes meaningful Major Hazardous Site Local Policies that support objectives preventing major accidents and limiting the off-site consequences of such accidents for human health, safety and			undermining the Plan’s ability to meet urgent housing needs. Conclusion: The Plan is not deliverable without significant risk to public safety and infrastructure capacity. 4. Consistent with National Policy ? The Plan fails to meet the housing targets set by the Standard Methodology and does not integrate consequence-based planning for flood risk or hazardous installations. This is contrary to NPPF guidance and Planning Practise Guidance on safe development and resilience. Furthermore, the Plan does not reflect legal duties under the Civil Contingencies Act 2004 or COMAH Regulations to plan for foreseeable emergencies. Conclusion: The Plan is inconsistent with national policy and statutory obligations for riskinformed development. In light of the above, we respectfully request that the Castle Point Local Plan 2026–2043 be withdrawn or substantially revised to address the issues raised in this representation. The Plan must be re-evaluated								emergency services considered in the supporting Infrastructure Delivery Plan (IDP). The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/	

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								the environment. Such policies, informed by the information provided by Upper Tier Establishments Safety Reports, specifically to assist with incumbent Off-Site Emergency and Land-Use-Planning.			to ensure it meets the tests of soundness, prioritises public safety, and complies with national policy and legal obligation. Is the Plan Legal ? On the basis that this plan has been constructed by professional planners, we could not consider ourselves qualified to challenge its legality, subsequently we are compelled to respond "YES" to this question. However, this submission sets out to indicate that CPBC draft Reg19 consultation may well prove to be unsound or even illegal, being neither positively prepared nor adequately evidenced. The advice provided at 1.09 and 1.10 of this submission, has not been made lightly and goes some way to support our argument that adopting a wholly no Green Belt development policy, at the expense of public safety is somewhat perverse. Prioritising mainland Green Belt protection without fully accounting for major incident hazard range and the potential for catastrophic flood events on Canvey Island, effectively								

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											subdividing the borough's communities, may make the draft CPBC Plan be deemed not only unreasonable but also unprincipled and corporately illogical.								

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0220-0005	Individual	Steve	Sawkins		Yes	GB1		CPBC Plan Page 126 5.01 We welcome and support the CPBC Plan's desire to protect the Borough's Green Belt. However we are most concerned at some of the findings contained in the Castle Point Green Belt Assessment. 5.02 The broader functions of the Canvey Island Green Belt, beyond the official Purposes, have received little importance and weight. It is apparent that the CPBC Plan indicates little enough weight given to assets included within areas GB1, GB2 and GB3. 5.03 We consider that the latest CPBC Green Belt Assessment is wrong to indicate that Parcels GB1 and GB2 in particular, should be identified as potential Grey Belt. Both Parcels meet the PPG criteria to remain as Green Belt. 5.04 Annex 2 of the NPPF defines Grey Belt Land, as land in the Green Belt comprising previously developed land and/or any other land that does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143 of the NPPF. 5.05 Quite clearly GB1 and GB2, Very Strongly	No	Positively Prepared, Effective, Justified, Consistent with National Policy	Summary Statement This representation is submitted in response to the Regulation 19 consultation on the Castle Point Borough Council Local Plan 2026–2043. It is our view that the Plan fails all four tests of soundness as defined in the National Planning Policy Framework (NPPF). The Plan is underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. 1. Is the Plan Positively Prepared ? The Plan is not positively prepared to meet the area's objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. The Plan selectively identifies flood risk constraints (Footnote 7)		Yes	To introduce and explain any extra specific supporting evidence in relation to the matters raised in this submission during the Examination in Public (EiP)		C	The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. Welcome and support the CPBC Plan's desire to protect the Borough's Green Belt. However we are most concerned at some of the findings contained in the Castle Point Green Belt Assessment. The broader functions of the Green Belt, beyond the official Purposes, have received little importance and weight	Green Belt/Grey belt covered under policy GB2. Non-Green Belt factors in relation to these sites are considered in the SLAA and SA. The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point,	N

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								contribute to Purpose a) to check the unrestricted sprawl of large built-up areas; Canvey Island being the most densely populated area within Castle Point. 5.06 Besides this, GB1, GB2 and GB3 all contribute to Purpose e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. As indicated by the CPBC Plan's development proposals for Canvey Island. 5.07 Furthermore, these parcels fall within the protections of Footnote 7. Parcel GB1 containing the Dutch Cottage a Listed Building. Parcel GB2 directly abutting a now rare Roman Saltern, a Scheduled Monument, of which Historic England note that in Essex, only a very small number remain. 11 GB2 with a strong boundary at the Southern and Eastern edges marked by the Hill Hall Dyke, a designated Main River. 12 5.08 GB1, GB2 and GB3 all fall within Tidal Flood Zone 3. Within a particularly vulnerable Area, reliant on the Tidal Barriers giving sole protection from Flooding, due to there being a			and then actively proposes development in those high-risk areas. The NPPF 2024 explicitly removes the ability for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey. Conclusion: The Plan does not seek to meet development needs in a sustainable or safe manner. 2. Is the Plan Justified ? The Plan lacks proportionate evidence and fails to consider reasonable alternatives. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequencebased analysis for vulnerable populations. Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-			process				Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an	

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								lack of sea wall defence alongside the Benfleet Station area, and the vulnerable clay banking sea defence alongside the RSPB land. 5.09 Development within any of these areas should constitute inappropriate development and amount to, reason enough to remain within the Green Belt Boundary and not to be considered Grey Belt. 5.10 We are concerned that these parcels have received a strategic re-branding, GB1, GB2 and GB3. During previous CPBC attempts at Plan-making they have been numbered Area 23 and Area 26. It is reasonable to consider that there may well be a specific reason to draw these areas to prominence within the Borough’s Green Belt parcels, to which we can only conclude what the CPBC Core Strategy Examining Inspector Mr P.Crysell identified as“Local Factors,”remains active and relevant today. Building any housing in flood zone 3, without at least first looking at alternatives, sequentially outside of these high risk areas (in addition to the Comah			prone areas, without demonstrating that safer alternatives were adequately considered. It fails to identify Canvey Island as a single flood cell requiring open space catchment areas for flood mitigation . Whilst the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey, despite failing to provide the required Level II SFRA Conclusion: The Plan is not based on proportionate evidence and fails to justify its spatial strategy. 3. Is the Plan Effective ? The Plan is not effective or deliverable given the known constraints. Major allocations such as West Canvey Island and the Seaview Road corridor lie within flood zones and lack infrastructure to support emergency planning. Pressures on roads and healthcare are acknowledged but not resolved through binding delivery mechanisms. The primary housing site is not shovel-ready and faces significant delivery time constraints.								appropriate development site for those reasons set out above. 2018 Green Belt Assessments still form part of the evidence and considered wider areas.	

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								sites) is indeed unreasonable, having already identified Canvey Island Brownfield spaces for Housing.			undermining the Plan’s ability to meet urgent housing needs. Conclusion: The Plan is not deliverable without significant risk to public safety and infrastructure capacity. 4. Consistent with National Policy ? The Plan fails to meet the housing targets set by the Standard Methodology and does not integrate consequence-based planning for flood risk or hazardous installations. This is contrary to NPPF guidance and Planning Practise Guidance on safe development and resilience. Furthermore, the Plan does not reflect legal duties under the Civil Contingencies Act 2004 or COMAH Regulations to plan for foreseeable emergencies. Conclusion: The Plan is inconsistent with national policy and statutory obligations for riskinformed development. In light of the above, we respectfully request that the Castle Point Local Plan 2026–2043 be withdrawn or substantially revised to address the issues raised in this representation. The Plan must be re-evaluated								

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											to ensure it meets the tests of soundness, prioritises public safety, and complies with national policy and legal obligation. Is the Plan Legal ? On the basis that this plan has been constructed by professional planners, we could not consider ourselves qualified to challenge its legality, subsequently we are compelled to respond "YES" to this question. However, this submission sets out to indicate that CPBC draft Reg19 consultation may well prove to be unsound or even illegal, being neither positively prepared nor adequately evidenced. The advice provided at 1.09 and 1.10 of this submission, has not been made lightly and goes some way to support our argument that adopting a wholly no Green Belt development policy, at the expense of public safety is somewhat perverse. Prioritising mainland Green Belt protection without fully accounting for major incident hazard range and the potential for catastrophic flood events on Canvey Island, effectively								

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0220-0006	Individual	Steve	Sawkins		Yes	C7	Yes	CPBC Plan Page 46 4.01 Extract from the 6-Point Plan for Canvey Island, concerning Canvey Lake. “The Section 19 Flood Investigation Report, published by Essex LLFA in September 2014, recommended a thorough investigation into the capacity available in the Canvey Lake. The lake, strategically located in the centre of the Island, forms part of the Island’s surface water drainage system and so ensuring it is kept in a good condition and able to receive surface water during storm events is vital.” 4.02 More Importantly; “In a further report by the government’s Chief Scientist, Sir Mark Walport, it was also mentioned that capacity of this lake needed to be addressed and maintained.” 4.03 “The MAP has completed the first phase of modeling the impacts of dredging the lake, to remove large amounts of silt which have built up over time. The group has also suggested re-profiling the banks of the lake, to provide additional storage capacity in high intensity	No	Positively Prepared, Effective, Justified, Consistent with National Policy	Summary Statement This representation is submitted in response to the Regulation 19 consultation on the Castle Point Borough Council Local Plan 2026–2043. It is our view that the Plan fails all four tests of soundness as defined in the National Planning Policy Framework (NPPF). The Plan is underpinned by incomplete evidence, lacks consequence-based risk analysis, and proposes development in areas where public safety cannot be guaranteed—particularly on Canvey Island. 1. Is the Plan Positively Prepared ? The Plan is not positively prepared to meet the area’s objectively assessed development needs in a sustainable manner. It adopts a narrow urban-focused strategy that disproportionately exposes vulnerable communities, particularly on Canvey Island, to extreme risks. The prioritisation of Green Belt land over public safety concerns undermines the integrity of the planning process. The Plan selectively identifies flood risk constraints (Footnote 7)		Yes	To introduce and explain any extra specific supporting evidence in relation to the matters raised in this submission during the Examination in Public (EiP)		C	No works have been done on Canvey Lake in 10 years despite the 6 point plan	Comments noted. The purpose of Policy C7 is to improve the space as a multifunctional green space and include a long term management plan to ensure its upkeep is maintained	N

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								rainfall events. This increased storage capacity could allow surface water to drain away from the network more effectively, whilst increasing the amount of water that could be held. It has been identified that any work on the lake would need to be followed by a regular planned maintenance programme.” 4.04 Canvey Lake is clearly one of the main assets within the Canvey Island surface water drainage system. Despite this and the findings of the government’s Chief Scientist, Sir Mark Walport’s, and the 6–Point Plan recognition, that it is “vital” for the Lake to be kept in good condition to perform its strategic function during storm events, no major work, nor maintenance, on the Lake has been undertaken, in the 10 years since the 2014 Summer Floods.			and then actively proposes development in those high-risk areas. The NPPF 2024 explicitly removes the ability for councils to set lower housing targets unless exceptional constraints are proven. While the Plan identifies such constraints on Canvey Island, it paradoxically allocates significant housing development to West Canvey. Conclusion: The Plan does not seek to meet development needs in a sustainable or safe manner. 2. Is the Plan Justified ? The Plan lacks proportionate evidence and fails to consider reasonable alternatives. The Strategic Flood Risk Assessment (SFRA) omits site-specific modelling and consequencebased analysis for vulnerable populations. Hazardous installations and port-related activities are inadequately assessed, with no detailed COMAH (Control of Major Accident Hazards) consequence analysis provided. The plan increases population exposure in the vicinity of known COMAH sites hazard range consequence and flood-			process					

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											undermining the Plan’s ability to meet urgent housing needs. Conclusion: The Plan is not deliverable without significant risk to public safety and infrastructure capacity. 4. Consistent with National Policy ? The Plan fails to meet the housing targets set by the Standard Methodology and does not integrate consequence-based planning for flood risk or hazardous installations. This is contrary to NPPF guidance and Planning Practise Guidance on safe development and resilience. Furthermore, the Plan does not reflect legal duties under the Civil Contingencies Act 2004 or COMAH Regulations to plan for foreseeable emergencies. Conclusion: The Plan is inconsistent with national policy and statutory obligations for riskinformed development. In light of the above, we respectfully request that the Castle Point Local Plan 2026–2043 be withdrawn or substantially revised to address the issues raised in this representation. The Plan must be re-evaluated								

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											to ensure it meets the tests of soundness, prioritises public safety, and complies with national policy and legal obligation. Is the Plan Legal ? On the basis that this plan has been constructed by professional planners, we could not consider ourselves qualified to challenge its legality, subsequently we are compelled to respond "YES" to this question. However, this submission sets out to indicate that CPBC draft Reg19 consultation may well prove to be unsound or even illegal, being neither positively prepared nor adequately evidenced. The advice provided at 1.09 and 1.10 of this submission, has not been made lightly and goes some way to support our argument that adopting a wholly no Green Belt development policy, at the expense of public safety is somewhat perverse. Prioritising mainland Green Belt protection without fully accounting for major incident hazard range and the potential for catastrophic flood events on Canvey Island, effectively								

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											subdividing the borough's communities, may make the draft CPBC Plan be deemed not only unreasonable but also unprincipled and corporately illogical.								
0221-0001	Individual	Georgia	Morris		Not Stated	SP3	Not Stated	Homes to be built here should be shared out in other districts and don't agree with taking over protected land and trying to change the status of that land	Not Stated	Not Stated			Not Stated		No		Homes to be built here should be shared out in other districts and don't agree with taking over protected land and trying to change the status of that land.	Comments noted	N

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0222-0001	Individual	Jonathan	Pinnock		Not Stated	SP3	Yes	Dear Sir/Madam, I have completed the online response and the id is in the title of this email. Since, there was only opportunity to respond to 20 individual policies, I would like to add that I am happy that the Castle Point Plan is overall “Sound” and has been legally prepared. I am grateful that the public have had plenty of opportunity to respond at various stages and that very detailed evidence has been provided to support the policies in the Plan. It is a far more robust and reasonable Plan compared with any which I have reviewed in the past 20 years or so.	Yes	Not Stated	Although my personal preference would be for no additional housing in Castle Point (due to already over-stretched infrastructure and resources), I understand the unacceptable pressure applied to CPBC by the National Government and I therefore accept the Plan as a reasonable compromise. I also recognise that certain individuals from the local Conservative party (who had previously failed to produce a Plan themselves before they were voted out of office), are actively trying to derail the Plan for their own purposes and have been spreading fear and misinformation amongst CPBC residents. I am concerned that their actions may directly result in far larger housing targets set by National Government than are in the current Plan, and may also result in the loss of Green Belt land which has been the concern uppermost in most residents minds over at least the past 20 years. I would respectfully ask that the Government Inspector takes note of these facts and concerns when reviewing the Plan. I would add that I am not, nor do I intend to be a member of any political party.		Not Stated		Not Answered		I would like to add that I am happy that the Castle Point Plan is overall “Sound” and has been legally prepared. I am grateful that the public have had plenty of opportunity to respond at various stages and that very detailed evidence has been provided to support the policies in the Plan. It is a far more robust and reasonable Plan compared with any which I have reviewed in the past 20 years or so. Although my personal preference would be for no additional housing in Castle Point (due to already over-stretched infrastructure and resources), I understand the unacceptable pressure applied to CPBC by the National Government and I therefore accept the Plan as a reasonable compromise.	Comments noted	N

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																	I also recognise that certain individuals from the local Conservative party (who had previously failed to produce a Plan themselves before they were voted out of office), are actively trying to derail the Plan for their own purposes and have been spreading fear and misinformation amongst CPBC residents. I am concerned that their actions may directly result in far larger housing targets set by National Government than are in the current Plan, and may also result in the loss of Green Belt land which has been the concern uppermost in most residents minds over at least the past 20 years. I would respectfully ask that the Government Inspector takes note of these facts and concerns when reviewing the Plan. I would add that I am not, nor do I intend to be a		

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																	member of any political party.		
0223-0001	Individual	Brian	Botham		Not Stated	SP3	Yes	Hello, My name is Brian Botham, I am a Town Councillor but I am writing as a private individual. I write with regard to the proposed local plan. Is it legally compliant? again I would have thought that council has carried out due diligence and that the plan conforms to government guidelines. But is the plan right for Canvey Island? The answer to that is a resounding NO! You cannot honestly expect to build another 3300 homes on an already overpopulated island. Our infrastructure will not cope with the increased traffic, our local services; doctors, dentists and schools etc will not be able to meet demand. There is also the ever present flood risk. Many areas in west Canvey where the majority of building is planned, is on marsh land or areas of conservation. Also I do not believe that the views and concerns of the local people have been fully taken into	Yes		The question of the plan being sound, I would expect that it is. I am sure that the borough council has invested a great deal of time, effort and money in making sure that the plan is sound. What I believe needs to be done is for the borough to arrange a meeting with the Housing Minister, go to Westminster and explain why Canvey Island is a special case and why mass building here is such a bad idea. The Canvey Island Independent Party was elected on their mandate to stop the overdevelopment of Canvey Island, by pushing this plan through, you are going against your electoral promise to the people who put you in power. This plan will not work for Canvey and will undoubtedly bring problems beyond belief if it is accepted.		Not Stated		No		Not the right Plan for Canvey Island You cannot honestly expect to build another 3300 homes on an already overpopulated island. Our infrastructure will not cope with the increased traffic, our local services; doctors, dentists and schools etc will not be able to meet demand. There is also the ever present flood risk. Many areas in west Canvey where the majority of building is planned, is on marsh land or areas of conservation. What I believe needs to be done is for the borough to arrange a meeting with the Housing Minister, go to Westminster and explain why Canvey	Infrastructure Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flooding Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Impacts upon natural environment covered by policies and supporting evidence. Policy SD8 covers Developments	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex

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								consideration. If this plan goes ahead, Canvey Island will be transformed from what it is today to just another concrete borough like Newham.									Island is a special case and why mass building here is such a bad idea. This plan will not work for Canvey and will undoubtedly bring problems beyond belief if it it accepted. I have recently written to you making objections to the proposed plan. Something that I really should have mentioned and didn't are the two COMAH sites on Canvey, one of which supplies aviation fuel to the RAF, this must surely qualify as a potential terrorist target.	near Hazardous Uses. Development proposals within the consultation zone will be assessed in accordance with the Health and Safety Executive (HSE) Guidance who may advise against development on health and safety grounds. The Council will place great weight on the recommendation provided by the HSE.	County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0223-0002	Individual	Brian	Botham		Not Stated	Not Stated	Not Stated	I have recently written to you making objections to the proposed plan. Something that I really should have mentioned and didn't are the two COMAH sites on Canvey, one of which supplies aviation fuel to the RAF, this must surely qualify as a potential terrorist target.	Not Stated				Not Stated		No		Cites the two OMAH sites are a potential terrorist target	Noted	N

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0224-0001	Individual	Ellie	Murray		Yes	B7	Yes	Dear Sir/Madam I do not support the Castle Point Plan Regulation 19 Draft Consultation I consider the draft plan to be legally compliant	Yes		I consider the draft plan to be sound South Benfleet Playing Fields are a vital flood plane for the area and provide a much loved and necessary community amenity. The result of any potential development within and beyond Richmond Avenue car park area may effect the flood plan and have serious consequences for housing in that area. One example of this was clearly demonstrated in Worcestershire and Somerset where development had been undertaken on and around flood planes which resulted in severe flooding in winter. Currently during extended periods of wet weather large areas of South Benfleet playing fields already become unusable and should any proposed development take place in the Richmond Road car park and extend into the park area this will effectively remove a significant area of the playing fields. REDACTED we already receive text notifications regarding flood warnings from the Environmental Agency surely these warnings will only increase with any development. The potential to build 27 homes and retain the local parking		Not Stated		No	B - see 0224-0002 and additional supporting evidence	The result of any potential development within and beyond Richmond Avenue car park area may effect the flood plan and have serious consequences for housing in that area. As residents of [REDACTED] we already receive text notifications regarding flood warnings from the Environmental Agency surely these warnings will only increase with any development. The potential to build 27 homes and retain the local parking space will result in a cramped development encroaching on the playing fields and the building of flats is out of keeping for the area. The removal of the car park/a reduction in spaces will drive the cars to park onto Richmond Avenue which already has minimal parking available with	Comments noted. Note that Policy B9 of the Plan is for South Benfleet Playing Fields to be master planned as a multi-functional green space. Part 3 of the policy is for New areas for water storage that will enhance the role of the area as a reservoir, and reduce the flood risk to those living on the periphery of the open space.	N

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											space will result in a cramped development encroaching on the playing fields and the building of flats is out of keeping for the area. The removal of the car park/a reduction in spaces will drive the cars to park onto Richmond Avenue which already has minimal parking available with drivers parking on the pavements making it difficult for wheelchair users and parents with babies and young children. As residents who have enjoyed continuous and uninterrupted use of the rear access from our property, we would state that we have a prescriptive right to this continued access. Along with the above Castle Point has recently confirmed that a transformation of Richmond Park and South Benfleet playing fields green space. With development of the houses will drive the community away from using the improved areas due to a reduction of the parking spaces along with years of ongoing building work which will create an eye sore to the projects if the building of houses was granted. We strongly oppose any development of South Benfleet playing fields.						drivers parking on the pavements making it difficult for wheelchair users and parents with babies and young children. As residents who have enjoyed continuous and uninterrupted use of the rear access from our property, we would state that we have a prescriptive right to this continued access.		

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0224-0002	Individual	Ellie	Murray		Yes	B7	Yes		Yes		An image is attached from Thursday 2nd October at 11:12am, where the car park is full & therefore where would these cars then be parked. This car park is used by both Parents and careers of those who attend South Benfleet Primary School, where it offers free and safe parking during the drop off/collection period. The cars would then be forced to park elsewhere as detailed in the paragraph above.		Not Stated		Yes	None	Image attached	Noted	N
0225-0001	Individual	Warren	Armstrong		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has not conducted upto date flood assessments for the areas of concern, and ignores very serious concerns around infrastructure and safety given Canvey's flood risk. I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. The proposed site additionally does not provide the	> PROPOSED MODIFICATIONS: Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option.	Not Stated		No	A	Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue

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											appropriate infrastructure for the additional dwellings. Services on Canvey are all ready over subscribed. Not all sites have been considered, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0225-0002	Individual	Warren	Armstrong		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0226-0001	Individual	Janine	Ford		Not Stated	SP3	Not Stated		Not Stated		Dear Sirs, Please read attached letters sent to the Echo. From[Redacted Personal Information] Dear Sirs, Please read the above emails sent to the Echo. I believe that they reflect the point of view of the vast majority of Canvey residents. We are extremely despondent that are views will be regarded as valid. Yours faithfully [Redacted Personal Information] to the Echo		Not Stated		Yes	A	RE: Canvey residents have been well and truly 'shafted' in Castle Point Plan being allocated 3,316 new homes. Far more than other local areas. This despite Canvey already being in desperate need of a second access route, having significant hazardous material storage and not forgetting Canvey is below sea level. 3,316 houses on Canvey - how can that be viable, fair or SAFE!.	Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy ' A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD8 covers Developments near Hazardous Uses.	N

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																		Development proposals within the consultation zone will be assessed in accordance with the Health and Safety Executive (HSE) Guidance who may advise against development on health and safety grounds. The Council will place great weight on the recommendation provided by the HSE.	

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0227-0001	Individual	Reece	Langleigh		Not Stated	SP3	No	I do not consider the plan to be sound or legally compliant. 1. Congestion on Canvey Island and Infrastructure Upgrades The plan acknowledges congestion on Canvey Island's access routes, noting that all traffic passes through one point. It proposes 3,300 dwellings on Canvey, which based on national averages of 2.4 persons per household and 1.40 vehicles per household in the East of England, could add approximately 7,400 residents and 4,400 vehicles. The plan seeks to enhance connectivity through highway, public transport, and other travel improvements, but lists only minor upgrades such as junction improvements for example Somnes Avenue/Link Road and bus enhancements, without addressing major access needs. A feasibility study for access improvements is referenced, but no deliverable scheme for a third road is identified, despite requirements. This level of housing to Canvey Island is reliant on major transport infrastructure upgrades of which no real study of sustainability or proof of agreement or funding is available, therefore rendering the plan	No	Not Stated	2. Applicability of North West Thundersley SoCG to Canvey Infrastructure The plans approach to North West Thundersley highlights significant highways and transportation constraints that cannot be easily mitigated (as noted in the related SoCG). Similar constraints apply to Canvey, where the plan recognises access bottlenecks but defers major solutions to future studies. The SoCG indicates that funding for infrastructure cannot impose an unaffordable public purse burden, which aligns with ECC's positions in other contexts. Without evidence of ECC commitment to funding major works like a third road (estimated at hundreds of millions), the plans reliance on such studies undermines its justification and effectiveness. 3. Reliance on Developer Contributions and Lack of SoCG with ECC Infrastructure delivery relies primarily on developer contributions. Viability assessments allow reductions if contributions are unviable. The plan claims SoCG's with ECC on highways and education, but no published evidence confirms agreements on Canvey specific		Not Stated		Yes, attached response in Word doc form	A	1. Congestion on Canvey Island and Infrastructure Upgrades The plan acknowledges congestion on Canvey Island's access routes, noting that all traffic passes through one point. It proposes 3,300 dwellings on Canvey, which based on national averages of 2.4 persons per household and 1.40 vehicles per household in the East of England, could add approximately 7,400 residents and 4,400 vehicles. The plan seeks to enhance connectivity through highway, public transport, and other travel improvements, but lists only minor upgrades such as junction improvements for example Somnes Avenue/Link Road and bus enhancements, without addressing major access needs. A feasibility	The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Infrastructure: Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Duty to Cooperate: Addressed in the Duty to Cooperate	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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								not effective. As growth occurs, shared highways the impacts are not mitigated, therefore likely a failure of duty to cooperate over cross-boundary infrastructure burdens.			infrastructure. 4. Lack of Evidence for Financial Backing Funding sources are indicative, primarily reliant on developer contributions and potential grants. No secured funding for all upgrades. The plan allows delays if gaps arise, but provides no statements or committed budgets, making delivery not effective. 5. Sequential and Exception Tests for Canvey Flood Zone 3a Canvey Island is largely in Flood Zone 3a; the plan applies the sequential test by prioritising non flood risk sites but allocates over half of the development on Canvey, mainland alternatives exist but are dismissed. This may not fully comply with NPPF flood risk policies. 6. Drainage, Flooding Risks, and COMAH Sites The planned growth on Canvey increases exposure without detailed risk assessments for COMAH and flooding scenarios, potentially failing effectiveness. The plan requires site specific FRA's for developments in flood zones and incorporating sustainable drainage systems (SuDS) of 90 litres per person day water efficiency, but no details on deliverability.						study for access improvements is referenced, but no deliverable scheme for a third road is identified, despite requirements. This level of housing to Canvey Island is reliant on major transport infrastructure upgrades of which no real study of sustainability or proof of agreement or funding is available, therefore rendering the plan not effective. As growth occurs, shared highways the impacts are not mitigated, therefore likely a failure of duty to cooperate over cross-boundary infrastructure burdens. 2. Applicability of North West Thundersley SoCG to Canvey Infrastructure The plans approach to North West Thundersley highlights significant highways and transportation constraints that	Statement and supporting Statements of Common Ground. Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Canvey Access: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex	Strategic Flood Risk Assessment (SFRA).

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																	cannot be easily mitigated (as noted in the related SoCG). Similar constraints apply to Canvey, where the plan recognises access bottlenecks but defers major solutions to future studies. The SoCG indicates that funding for infrastructure cannot impose an unaffordable public purse burden, which aligns with ECC's positions in other contexts. Without evidence of ECC commitment to funding major works like a third road (estimated at hundreds of millions), the plans reliance on such studies undermines its justification and effectiveness. 3. Reliance on Developer Contributions and Lack of SoCG with ECC Infrastructure delivery relies primarily on developer contributions.	Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan	

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																	Viability assessments allow reductions if contributions are unviable. The plan claims SoCG's with ECC on highways and education, but no published evidence confirms agreements on Canvey specific infrastructure. 4. Lack of Evidence for Financial Backing Funding sources are indicative, primarily reliant on developer contributions and potential grants. No secured funding for all upgrades. The plan allows delays if gaps arise, but provides no statements or committed budgets, making delivery not effective. 5. Sequential and Exception Tests for Canvey Flood Zone 3a Canvey Island is largely in Flood Zone 3a; the plan applies the sequential test by prioritising non		

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																	flood risk sites but allocates over half of the development on Canvey, mainland alternatives exist but are dismissed. This may not fully comply with NPPF flood risk policies. 6. Drainage, Flooding Risks, and COMAH Sites The planned growth on Canvey increases exposure without detailed risk assessments for COMAH and flooding scenarios, potentially failing effectiveness. The plan requires site specific FRA's for developments in flood zones and incorporating sustainable drainage systems (SuDS) of 90 litres per person day water efficiency, but no details on deliverability.		
0228-0001	Individual	Charles	Hayden		Not Stated	SP3	Not Stated	Why on earth would you want to build more houses on Canvey Island it cannot deal with the traffic now so if you decide to build more homes what would happen in an emergency you people that give the go ahead obviously do not live on	Not Stated	Not Stated			Not Stated		No		Too many houses proposed for Canvey Island. Traffic already a problem. Concerned if there was a future emergency.	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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								Canvey Island if there was an emergency at the moment without any new homes it would be a struggle to get of, so in the event of an emergency who would take responsibility I bet it would it would be pushed from one person to another meaning no body would , I speak for everyone who live on Canvey Island, it's disgusting how people hear get treated.										The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy ‘ A Better Connected Essex’ has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan	
0229-0001	Individual	Jennifer	Williams		Yes	Whole Plan	Yes	Dear Sir/Madam I support the Castle Point Plan Regulation 19 Draft Consultation I consider the draft plan to be legally compliant.	Yes		I consider the draft plan to be sound		Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N
0230-0001	Individual	Kevin	Foley		Not Stated	For word	Not Stated	As a retired IT project manager, I consider myself reasonably computer literate. However, I was genuinely astonished by how unnecessarily complex the consultation response form is. To submit a comment, one must first locate and provide all of the following: * Policy	Not Stated	Not Stated			Not Stated		No		States the consultation response form is unnecessarily complex and that it creates unnecessary barriers to participation.	Comments noted	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
								reference or name * Page number * Paragraph number * Site number or name * Objective number or name * Appendix reference or name * Table or diagram reference number * Image or map reference number This requires navigating the interactive map and cross-referencing multiple documents just to begin commenting. Frankly, it's an over-engineered process that creates unnecessary barriers to participation. Sorry, but that's simply absurd, so I gave up completing the form.											
0231-0001	ERROR																		
0232-0001	ERROR																		
0233-0001	ERROR																		
0234-0001	ERROR																		
0235-0001	ERROR																		
0236-	ERROR																		

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0001																			
0237-0001	ERROR																		
0238-0001	ERROR																		
0239-0001	ERROR																		
0240-0001	Individual	Helen	Sweeney		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, consistent with National Policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at highest risk of	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0240-0002	Individual	Hel en	Swe ne y		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No t Sta ted		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0241-0001	Individual	Do nal d	Boyl e		Not State d	Wh ole Pla n	Yes	We support the plan	Ye s				No t Sta ted		No		Castle Point Plan is sound and legally compliant,	Support Noted	N

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024-2-0001	Individual	Susan	Boyle		Not Stated	Whole Plan	Yes	We support the plan	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N
024-3-0001	Individual	Jan	Payne		Not Stated	SP3	Not Stated	Firstly, we would like to thank you for protecting our green belt and for listening and responding to the concerns and suggestions raised by the residents in the previous consultation. However, we would like to point out that we, along with many others, have found your on-line process for this consultation to be far too longwinded and very complex. You are asking for the general public to sit down and read hours' worth of documentation, (which is very hard to do if you only have access to only a mobile phone) and to fully understand all the implications and 'generic' statements. So, we hope that you'll accept our views as to why we believe certain policies are not SOUND, (we are not qualified to say whether your plans are legal or not) which we have opted to email, as your feedback form is too complicated and off-putting. We also suggest that you read the Facebook page for Essex Planning where many others have expressed their views. We feel that you should have incorporated within the plan details of planning	No	Not Stated			Not Stated		No	B - see 024-3-0002 to 0003	Support the protection of the green belt. We feel that you should have incorporated within the plan details of planning applications that have already been approved and those that are in the process of being granted, as how else can we get a true picture of what is happening in this Borough? Canvey: Concerns with access and congestion. Policy Thun2: Your proposal to build 730+ properties in Thundersley (Thun2): How can you put this forward when you have no plan as to whether the existing facilities-Runnymede Leisure Centre & Hall, Council offices and SEEVIC are going to remain or be positioned elsewhere? If they are to be	Existing Commitments: Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025). However, it is agreed that the plan could have been clearer on this point and a modification is proposed to signpost this reference in the supporting text. Canvey Access The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better	Y-Para 6.42 In addition to this planned supply, consideration has been given to supply already in the pipeline. These are sites that have already been granted planning permission, known as existing commitments. This pipeline of supply forms the starting point for the housing

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								applications that have already been approved and those that are in the process of being granted, as how else can we get a true picture of what is happening in this Borough? With regards to Canvey Island: We understand that you are trying to seek a third access road, but until you have concrete plans in place for this, how you can entertain building what appears to be the lion's share of the housing allocation for Castle Point on the Island? You will see comments on Facebook about how difficult it is to build on Canvey due to the nature of the marshland and composition of the soil. We are also aware of how congested these roads become in peak hours and that's before any accidents which grid locks the whole area including the High Road in South Benfleet. Your proposal to build 730+ properties in Thundersley (Thun2): How can you put this forward when you have no plan as to whether the existing facilities- Runnymede Leisure Centre & Hall, Council offices and SEEVIC are going to remain or be positioned elsewhere? If they are to be reallocated, you have made no consideration or provision for this in the								reallocated, you have made no consideration or provision for this in the 'plan.' You also refer to 'campus' style accommodation. What does this mean? That students will get priority over these properties rather than them being utilised for home ownership? This area is already congested throughout rush hour which includes the school run for King John and if you keep SEEVIC here, you will have to consider where the students will park as they already overflow into the existing council carpark. We welcome the fact that you will engage with the local community because we cannot see how you can squeeze the desired number of properties within this space without it feeling very cramped and overpopulated.		Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Thun2 allows for the existing facilities to be incorporated within an on-site redevelopment, so an offsite location may not necessarily be required. Parking provision covered under Policy T7 . Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	growth that will happen over the Plan period. As of 1st April 2025, development totalling 480 new homes had the benefit of planning permission. The housing trajectory which supports the Castle Point Plan is set out at Appendix 2 of the Housing Topic paper (August 2025)

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								‘plan.’ You also refer to ‘campus’ style accommodation. What does this mean? That students will get priority over these properties rather than them being utilised for home ownership? This area is already congested throughout rush hour which includes the school run for King John and if you keep SEEVIC here, you will have to consider where the students will park as they already overflow into the existing council carpark. We welcome the fact that you will engage with the local community because we cannot see how you can squeeze the desired number of properties within this space without it feeling very cramped and overpopulated. Another concern with these larger developments is the lack of provision for parking and the assumption that everyone will walk, cycle, or take the bus. People will always have cars and if not enough parking allocation is provided, these vehicles will end up parked down neighbouring sideroads causing obstructions and friction. It seems that you assume that all new residents will be able to work in the local area, how will you ensure this? Will this influx of cvclist’s be											Parking: Another concern with these larger developments is the lack of provision for parking and the assumption that everyone will walk, cycle, or take the bus. People will always have cars and if not enough parking allocation is provided, these vehicles will end up parked down neighbouring sideroads causing obstructions and friction. It seems that you assume that all new residents will be able to work in the local area, how will you ensure this? Will this influx of cyclist’s be safe on our busy roads? Prices of bus journeys will need to be decreased too. It’s currently £3 each way per person, which would make any two-way trip for a family an expensive outing. You also need to take into		

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sounded?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
								safe on our busy roads? Prices of bus journeys will need to be decreased too. It's currently £3 each way per person, which would make any two-way trip for a family an expensive outing. You also need to take into consideration the housing target for Southend which will impact dramatically upon our roads, and it is rather worrying that Southend BC have also requested Castle Point take some of their housing allocation, to which you do not appear to have given a definitive answer. You must remember that whatever you promise in the 'plan' regarding building targets, the government will expect you to adhere too. It can't be based on speculation or 'what if's.' And as pointed out by Rebecca Harris, you have not specified an allocation that will be built within the next five years and neither have you put across a stronger enough case within the plan for falling short of the governments housing target for our Borough.									consideration the housing target for Southend which will impact dramatically upon our roads, and it is rather worrying that Southend BC have also requested Castle Point take some of their housing allocation, to which you do not appear to have given a definitive answer. No 5 year supply.		
0243-0002	Individual	Jan	Payne		Not Stated	SP4	Not Stated		Not Stated	Not Stated	Firstly, all the infrastructure must be in place and a guarantee from the developers that all promised additions ie, GP surgeries, nurseries, improved junctions, affordable houses and		Not Stated		No	No	linfrastructure must be in place and a guarantee from the developers that all promised additions ie, GP surgeries, nurseries,	Infrastructure Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure	N

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											assisted living for the elderly are delivered and not postponed at the last moment or take years to implement after the main development had been built. Secondly, Southend Hospital cannot cope at the moment. [REDACTED] How will they cope when all these extra people are living in Castle Point? You must take into consideration the huge influx of residents that Southend B.C are expecting too. What are your intentions for dealing with the issue so that the hospital can cope and provide a safe environment that isn't detrimental to patients' health and wellbeing?						improved junctions, affordable houses and assisted living for the elderly are delivered and not postponed at the last moment or take years to implement after the main development had been built. Southend Hospital cannot cope at the moment.	Delivery Plan (IDP).	
0243-0003	Individual	Jan	Payne		Not Stated	T1	Not Stated		Not Stated	Not Stated	I still cannot understand how you expect everyone residing in one of these new properties to use the bus, walk or cycle and follow the 'formula' for allocated vehicle and cycle parking (including businesses), how this will realistically work? I certainly wouldn't want to cycle on our roads and not everyone is a ten-minute		Not Stated		No	No	Unrealistic expectation on limiting car use and peoples' willingness to walk, cycle or take public transport. Concern over congestion.	Noted Highways Impacts The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and	N

ID Ref	Individual/Organisation/Age nt?	Firs t Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											walk from a bus stop. In an ideal and perfect world, it would be wonderful if we restricted car use, but it is not realistic. If it was that easy, we'd all be doing it now. I can only see the roads become more gridlocked at peak times, with higher pollution levels for the residents, especially with the new AI building approved in Basildon. Finally, how will the amalgamation of the councils affect all this? And has anyone from the government actually visited this area during a rush hour and experienced the A127, A130 and A13. The road improvements at Fairglen Interchange will only move the queues further up these roads.							recommending interventions.	
0244-0001	Individual	Keith	Payne		Not Stated	SP3	Not Stated	Firstly, we would like to thank you for protecting our green belt and for listening and responding to the concerns and suggestions raised by the residents in the previous consultation. However, we would like to point out that we, along with many others, have found your on-line process for this consultation to be far too longwinded and very complex. You are asking for the general public to sit down and read hours' worth of documentation, (which is very hard to do if you only have access to only a	No	Not Stated			Not Stated		No	B - see 0244-0002	Support the protection of the green belt. We feel that you should have incorporated within the plan details of planning applications that have already been approved and those that are in the process of being granted, as how else can we get a true picture of what is happening in this Borough? Canvey: Concerns	Existing Commitments: Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025). However, it is agreed that the plan could have been clearer on this point and a modification is	Y -Para 6.42 In addition to this planned supply, consideration has been given to supply already in the pipeline. These are sites that have

ID Ref	Individual/Organisation/Age nt?	Firs t Na me	Last Na me	If orga nisat ion - nam e	Has agree d to publi catio n of Name /Com ment s?	Poli cy/ Par a No.	2a. Leg ally Co mp lia nt?	2b. If No, explanation	3a. So und?	3b. Positive/Eff ective/Justif ied/Consist ent?	3c. Explanation	4. Suggested modifications	5. Wi sh to par tici pat e in ex am	6. Why?	Sup porti ng Evid enc e sup plie d?	Opt ion A, B or C	Summary	Officer Response	Mods Require d	
								mobile phone) and to fully understand all the implications and ‘generic’ statements. So, we hope that you’ll accept our views as to why we believe certain policies are not SOUND, (we are not qualified to say whether your plans are legal or not) which we have opted to email, as your feedback form is too complicated and off-putting. We also suggest that you read the Facebook page for Essex Planning where many others have expressed their views. We feel that you should have incorporated within the plan details of planning applications that have already been approved and those that are in the process of being granted, as how else can we get a true picture of what is happening in this Borough? With regards to Canvey Island: We understand that you are trying to seek a third access road, but until you have concrete plans in place for this, how you can entertain building what appears to be the lion’s share of the housing allocation for Castle Point on the Island? You will see comments on Facebook about how difficult it is to build on Canvey due to the nature of the marshland and composition of the soil.										with access and congestion. Policy Thun2: Your proposal to build 730+ properties in Thundersley (Thun2): How can you put this forward when you have no plan as to whether the existing facilities-Runnymede Leisure Centre & Hall, Council offices and SEEVIC are going to remain or be positioned elsewhere? If they are to be reallocated, you have made no consideration or provision for this in the ‘plan.’ You also refer to ‘campus’ style accommodation. What does this mean? That students will get priority over these properties rather than them being utilised for home ownership? This area is already congested throughout rush hour which includes the school run for King John and if you keep	proposed to signpost this reference in teh supoorting text. Canvey Access The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy ‘ A Better Connected Essex’ has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Thun2 allows for the exixting facilities to be incorporated within an on-site redevelopment, so an offsite location may not necessarily be required.	already been granted planning permission, known as existing commitments. This pipeline of supply forms the starting point for the housing growth that will happen over the Plan period. As of 1st April 2025, develop ment totalling 480 new homes had the benefit of planning permission. The housing trajectory which

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								We are also aware of how congested these roads become in peak hours and that’s before any accidents which grid locks the whole area including the High Road in South Benfleet. Your proposal to build 730+ properties in Thundersley (Thun2): How can you put this forward when you have no plan as to whether the existing facilities- Runnymede Leisure Centre & Hall, Council offices and SEEVIC are going to remain or be positioned elsewhere? If they are to be reallocated, you have made no consideration or provision for this in the ‘plan.’ You also refer to ‘campus’ style accommodation. What does this mean? That students will get priority over these properties rather than them being utilised for home ownership? This area is already congested throughout rush hour which includes the school run for King John and if you keep SEEVIC here, you will have to consider where the students will park as they already overflow into the existing council carpark. We welcome the fact that you will engage with the local community because we cannot see how you can squeeze the desired number of properties within									SEEVIC here, you will have to consider where the students will park as they already overflow into the existing council carpark. We welcome the fact that you will engage with the local community because we cannot see how you can squeeze the desired number of properties within this space without it feeling very cramped and overpopulated. Parking: Another concern with these larger developments is the lack of provision for parking and the assumption that everyone will walk, cycle, or take the bus. People will always have cars and if not enough parking allocation is provided, these vehicles will end up parked down neighbouring sideroads causing obstructions and friction. It seems that you assume	Parking provision covered under Policy T7 . Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply.	supports the Castle Point Plan is set out at Appendix 2 of the Housing Topic paper (August 2025)

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								this space without it feeling very cramped and overpopulated. Another concern with these larger developments is the lack of provision for parking and the assumption that everyone will walk, cycle, or take the bus. People will always have cars and if not enough parking allocation is provided, these vehicles will end up parked down neighbouring sideroads causing obstructions and friction. It seems that you assume that all new residents will be able to work in the local area, how will you ensure this? Will this influx of cyclist's be safe on our busy roads? Prices of bus journeys will need to be decreased too. It's currently £3 each way per person, which would make any two-way trip for a family an expensive outing. You also need to take into consideration the housing target for Southend which will impact dramatically upon our roads, and it is rather worrying that Southend BC have also requested Castle Point take some of their housing allocation, to which you do not appear to have given a definitive answer. You must remember that whatever you promise in the 'plan' regarding building targets, the government will expect									that all new residents will be able to work in the local area, how will you ensure this? Will this influx of cyclist's be safe on our busy roads? Prices of bus journeys will need to be decreased too. It's currently £3 each way per person, which would make any two-way trip for a family an expensive outing. You also need to take into consideration the housing target for Southend which will impact dramatically upon our roads, and it is rather worrying that Southend BC have also requested Castle Point take some of their housing allocation, to which you do not appear to have given a definitive answer. No 5 year supply.		

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								you to adhere too. It can't be based on speculation or 'what if's.' And as pointed out by Rebecca Harris, you have not specified an allocation that will be built within the next five years and neither have you put across a stronger enough case within the plan for falling short of the governments housing target for our Borough.											
0244-0002	Individual	Keith	Payne		Not Stated	SP4	Not Stated		Not Stated	Not Stated	All infrastructure must be put in place as building progresses.		Not Stated		No	No	All infrastructure must be put in place as building progresses.	Infrastructure Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N
0245-0001	Individual	Stephanie	Briggs		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites".	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered	respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		through the SFRA.	
0245-0002	Individual	Stephanie	Briggs		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0246-0001	Individual	Paul Leslie	Prosho		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. > I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage		Not Stated		No		Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastru

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	cture network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0246-0002	Individual	Paul	Prosho		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0247-0001	Individual	Christine	Marshall		Yes	SP3	No	Dear Sir/Madam, I consider the Castle Point Plan Regulation 19 Draft is not legally compliant, as it has failed to consider strategic alternatives, for instance, North West Thundersley as it has no credible five-year housing land supply.	No	Justified, Consistent with national policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt/Grey Belt against new NPPF guidelines. The draft local plan isn't justified. The site selection strategy is biased and predetermined towards a 'no greenbelt build policy' The site selection is solely based on the 'over development of Brownfield sites'. The plan has not considered all sites, with no Greenbelt/Grey Belt sites added, and the exclusion of the North West Thundersley site. The NPPF guidelines state development should be directed away from areas at highest risk of flooding. SuDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The proposed 3316 urban homes for Canvey is not resident led.	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No		No		Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																	emergency evacuation procedures.	(SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Strategic Flood Risk Assessment (SFRA).
0247-0002	Individual	Christine	Marshall		Yes	C4	No	The proposed number of Canvey West homes puts residents to the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0248-0001	Individual	Gill	Pinnock		Yes	Whole Plan	Yes	Dear Sir/Madam, Re Reg 19 consultation I believe the plan has been legally prepared and is sound.	Yes				Not Stated		No		Castle Point Plan is sound and legally compliant,	Support Noted	
0249-0001	Individual	Deborah	Bryant		Yes	SP3	No	Dear Sir/Madam, I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with national policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No	A	Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites".	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and

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											predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island’s unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe								Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Object to proposals for residential on Charfleets.	not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered	respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council’s SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.							through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	
0249-0002	Individual	Deborah	Bryant		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0250-0001	Individual	Anthony Shawn	Morley		Yes	SP3	No	> Dear Sir/Madam, This is my own personal response to the Castle Point Plan Regulation 19 Draft consultation. I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with national policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. > Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. > Remove Charfleets Industrial Estate site from the plan. > Total housing target of 11,000.	No		No		Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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											operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes. > > Note, I do not wish to participate at the oral examination. > I am happy that my name will be published alongside my comments to the Castle Point Plan Regulation 19 consultation. > Please acknowledge receipt of my submission. Kind regards Mr Anthony Shawn Morley >							emergency evacuation procedures. Object to proposals for residential on Charfleets.	(SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement ' the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	Strategic Flood Risk Assessment (SFRA).

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											31 St Marks Road > Canvey Island > Essex > SS8 9NJ >								
0250-0002	Individual	Anthony Shawn	Morley		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0251-0001	Individual	Amanda	Jacobs		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA) .
0251-0002	Individual	Amanda	Jacobs		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency	Needs of emergency services considered in the supporting Infrastructure	N

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																	evacuation procedures	Delivery Plan (IDP).	
025 2-000 1	Individual	Frances	Reading		Not Stated	Whole Plan	No	It is not legally compliant and is very unsound also not fair on the residents of canvey which is an island.	No	Not Stated			Not Stated		No		Not fair on the residents of canvey which is an island.	Comments noted.	N
025 3-000 1	Individual	Karen	Howe		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. As well as all the jargon Canvey is already overpopulated, should the Oikos aviation fuel terminal	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design

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											fail this would be a bigger disaster than Buncefield! The local councillors admitted to me at the meeting there are no evacuation planes in place for Canvey!! One little car crash and the island comes to a stand still. The site is right next to a site of Special Scientific Interest- one of only two in the world! How will this effect the endangered species on this site with extra pollution a potential 6,000 plus extra cars will cause?!! Very disappointed in Castle Point Council!!						homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Highlight the risks of the Oikos aviation fuel termina. Concerned that there are no evacuation planes in place for Canvey.	Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Emergency Planning Policy SD8 covers Developments near Hazardous Uses. Development proposals within the consultation zone will be assessed in accordance with the Health and Safety Executive (HSE) Guidance who may advise against development on health and	Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		safety grounds. The Council will place great weight on the recommendation provided by the HSE. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	
0253-0002	Individual	Karen	Howe		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0254-0001	Individual	Cheryl	Sammons		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It has no credible five-year housing land supply.	No	Justified, Consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered e.g. Greenbelt / Grey Belt sites. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Other examples of Canvey not being a viable alternative location are: Road network is already strangled by high volumes of traffic, in particular during rush hour periods. To address this would not only require the much needed third road being built but a major reworking of the existing routes so that they do converge at		Not Stated		No	A	Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	N

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											Waterside roundabout and more lanes being added. Also Sadlers farm roundabout was poorly designed as the route off the A13 is only 2 lanes and therefore includes traffic going to North and South Benfleet and the traffic going to Canvey has to sit in a queue and then negotiate 2 sets of traffic lights before getting onto a Canvey Way (aka Remembrance Avenue) which is only a single land road. The health care is also already stretched and without additional Doctors/Dentists etc would not be able to provide adequate care for the residents. Investment would require to be made in additional schools in particular another secondary school would be essential, as the demolition of Furtherwick Park school to facilitate the relocation of Castleview School reduced this from 3 to 2. Has the bus and train routes been considered as with this number of additional residents commuter routes will become overcrowded and potentially unusable? This list is by no means exhaustive but a mere example of some of the issues that will require to be considered before						emergency evacuation procedures. Canvey: Concern over traffic impacts, public transport, healthcare and education.	(SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Emergency Planning Policy SD8 covers Developments near Hazardous Uses. Development proposals within the consultation zone will be assessed in accordance with the Health and Safety Executive (HSE) Guidance who may advise against development on health and safety grounds. The Council will place great weight on the recommendation provided by the	

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											approving the proposed plan.							HSE. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP). Canvey Access The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy ‘A Better Connected Essex’ has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Infrastructure matters (including healthcare and	

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																		education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
0254-0002	Individual	Cheryl	Sammons		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0255-0001	Individual	Scott	Spinks		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, Consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate	Green Belt/Grey belt covered under policy GB2. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). Flooding : Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. North-West Thundersley	N

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																	for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Add NW Thundersley.	North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. North west Thundersley was not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability	

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																		Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	
0255-0002	Individual	Scott	Spinks		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0256-0001	Individual	Chris	Menere		Not Stated	SP3	Not Stated	I strongly reject any type of building and planning on the Hadleigh Salvation Army Field: GB8, Site name: Land south of Hadleigh 64 Ha of agricultural fields adjoining all the southern edge of Hadleigh urban area. The capacity of the local infrastructure is already at breaking point, particularly Monday to Friday during the hours of people going to work and the school runs, and, on the weekends, it can be absolute grid lock from Morrisons down to Hadleigh / Leigh on Sea boarder, which can take 10 minutes to travel 2 miles. The constraints on the Hadleigh – London Road would only compound with more houses with the development. Local roads already suffer from congestion at key junctions, which means that they may be unable to accommodate the additional traffic demands arising from significant new housing growth. Key points from your objection include: 1. Green Belt and open spaces are protected and of all the green belt spaces for development, GB8 should be rejected. 2. GB8 is a place of peace, open spaces, beautiful historic landscape and	Not Stated	Not Stated	Dear Castlepoint Planning Please find attached my letter and views on the development of GB8 Hadleigh Salvation Army Green Belt fields. Regards Chris		Not Stated		Yes, appendix 1 is a photo of a map of Hadleigh Farmland with a red box around the remains of the Roman Fort		Objects to any type of building and planning on the Hadleigh Salvation Army Field: GB8. The capacity of the local infrastructure is already at breaking point, particularly Monday to Friday during the hours of people going to work and the school runs, and, on the weekends, it can be absolute grid lock from Morrisons down to Hadleigh / Leigh on Sea boarder, which can take 10 minutes to travel 2 miles. The constraints on the Hadleigh – London Road would only compound with more houses with the development. Local roads already suffer from congestion at key junctions, which means that they may be unable to accommodate the additional traffic demands arising from significant new housing growth. Key points from your objection include:	Comments noted	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required			
								provides recreational value to the whole community. 3. GB8 has the buried remains of a Roman fort, Heritage Category: Scheduled Monument See appendix 1 4. GB8 is a historic site with 1891 of history and ownership under The Salvation Army, they should be keeping what's left as green belt at all costs. The Salvation Army purchased the land to serve the local community, selling parcels of land for large housing developments does not serve the community - period. 5. GB8 Development would severely overload local roads and infrastructure. 6. GB8 Development would create unacceptable strain on the London Road at peak times and weekends. 7. GB8 The current infrastructure of Hadleigh would not be able to cope with the development of 64Ha! 8. GB8 The development just doesn't make any common sense to the current demand on the area. Castlepoint have better and more suitable options 9. GB8 will not be affordable housing, the land will be sold as a premium, the "builders" will build high-end houses												1. Green Belt and open spaces are protected and of all the green belt spaces for development, GB8 should be rejected. 2. GB8 is a place of peace, open spaces, beautiful historic landscape and provides recreational value to the whole community. 3. GB8 has the buried remains of a Roman fort, Heritage Category: Scheduled Monument 4. GB8 is a historic site with 1891 of history and ownership under The Salvation Army, they should be keeping what's left as green belt at all costs. The Salvation Army purchased the land to serve the local community, selling parcels of land for large housing developments does not serve the community - period. 5. GB8 Development would severely		

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								taking full advantage of the Thames River, Estuary views and Kent views. This is prime land for a builder and will not be sold off cheap. You know this! 10. GB8 development would have considerable impact on the existing local service and schools; The King John School, Hadleigh Junior School, Hadleigh Infants and Nursery School. Plus, doctors and dentist clinics that are already over subscribed and not taking on any new patients. 11. With 17 other green belt sites for consideration, then there is absolutely no reason or rational for the council to choose GB8. If I was to support any development of the development of Green Belt, it would these three options, being in order of preference below. ONE: GB16 Northwest of Thundersley 160 Ha collection of “plotlands” north of the Benfleet urban area on the junction of A127/ A130/ A1245. There are existing low density industrial units and homes within this area. WHY: Development of the GB16 (160Ha) site in Northwest Thundersley should be the council’s strategic option for housing development. Here’s a breakdown of the key points								overload local roads and infrastructure. 6. GB8 Development would create unacceptable strain on the London Road at peak times and weekends. 7. GB8 The current infrastructure of Hadleigh would not be able to cope with the development of 64Ha! 8. GB8 The development just doesn’t make any common sense to the current demand on the area. Castlepoint have better and more suitable options 9. GB8 will not be affordable housing, the land will be sold as a premium, the “builders” will build high-end houses taking full advantage of the Thames River, Estuary views and Kent views. This is prime land for a builder and will not be sold off cheap. You know this! 10. GB8 development would			

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								and rationale: 1. Minimal Impact on Local Services and Infrastructure: o Developing the GB16 site would have limited impact on local roads, high streets, schools (both primary and secondary), children's nurseries, and medical services (doctors/dentists). Due to the site's location, it is not in an area of high congestion or near densely populated community centres. 2. Proximity to Major Roads (A13 and A127): o Easy access to major roads such as the A13 and A127 is highlighted as a key advantage. These routes would provide convenient transportation links for new residents, reducing strain on smaller local roads and possibly avoiding further traffic congestion in Hadleigh town centre. 3. Government Housing Targets: o The GB16 site, with its 160 hectares of land, would help meet the government's housing targets for new builds. 4. Large Plot of Land: o The GB16 plot is larger than what is potentially required, as the council has indicated a need for 120 hectares. This surplus of space could provide additional opportunities for developers to include								have considerable impact on the existing local service and schools; The King John School, Hadleigh Junior School, Hadleigh Infants and Nursery School. Plus, doctors and dentist clinics that are already over subscribed and not taking on any new patients. 11. With 17 other green belt sites for consideration, then there is absolutely no reason or rational for the council to choose GB8. If I was to support any development of the development of Green Belt, it would these three options, being in order of preference below. ONE: GB16 Northwest of Thundersley 160 Ha collection of "plotlands" north of the Benfleet urban area on the junction of A127/ A130/ A1245. The Council could aim to achieve the			

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								community benefits such as green spaces, infrastructure improvements, or other amenities. 5. Opportunity for Large Developers: o Major property developers like Redrow, Taylor Wimpey, Barratt, Bellway, Persimmon, are likely candidates for this project. Given their significant profits, it is argued they should reinvest in the community, potentially funding new schools, parks, and other facilities as part of the development. 6. Green Belt Consideration: o While green belt land is generally protected, the argument acknowledges that if green belt development is necessary, GB16 offers a suitable option due to its size and potential benefits to the area. 7. Win-Win: o The case that the GB16 site could be developed responsibly, with minimal negative impact on existing local infrastructure and services, while also providing an opportunity for developers to contribute to community improvements makes for a good argument. This could be a win-win for both the council in meeting its housing obligations and								amount of housing set out in the Government's standard methodology (7,100 new homes 2023-2043). Of this 3,727 would be in the urban area as per Option 1, leaving 3,373 that would have to be met in the Green Belt. This is 2,000 more in total than in Option 2a, and would require approximately 70 additional hectares of land (120 Hectares in total) in order to be delivered” GB16 @ 160Ha, could support the housing target of 3,373 (Green Belt) with 120Ha and leaves 40Ha for the “builders” to contribute to new services and school, etc... If the site delivered 3,373 homes with an average selling price of £400,000 that's £1.3 billion pounds of sales. TWO: GB4 Land off Glebelands 8 Ha grassland between the western edge of Benfleet urban area			

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								for the developers in building large-scale projects. Reference consultation document. Quote: “issues-and-options-consultation-document-final-web-version” Page 52; Option 3 – Release significant Green Belt land to meet standard methodology housing need “The Council could aim to achieve the amount of housing set out in the Government’s standard methodology (7,100 new homes 2023-2043). Of this 3,727 would be in the urban area as per Option 1, leaving 3,373 that would have to be met in the Green Belt. This is 2,000 more in total than in Option 2a, and would require approximately 70 additional hectares of land (120 Hectares in total) in order to be delivered” GB16 @ 160Ha, could support the housing target of 3,373 (Green Belt) with 120Ha and leaves 40Ha for the “builders” to contribute to new services and school, etc... If the site delivered 3,373 homes with an average selling price of £400,000 that’s £1.3 billion pounds of sales. To award such a large housing development to a national British housebuilder, the council would have some												and the A130, north of the Sadlers Farm roundabout. THREE: GB5 Land west of Benfleet 39 Ha grassland with some wooded areas and limited industrial activity between the western edge of Benfleet urban area and the A130, south of the Sadlers Farm roundabout. In summary: My stance is that while housing is needed, GB8 is not the appropriate location for such a large-scale development due to its significant impact on the local environment, infrastructure, and the community's quality of life. I support development on alternative sites that would cause less disruption and better align with the area’s infrastructure and community needs.		

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								negotiating “power” to get some significant contribution from the builder to spend on the community. GB16 could actual be development like the “Beaulieu” neighbourhood in Chelmsford, off White Hart Lane / A1016. Every time I travel to Stanstead this estate development always impresses me! TWO: GB4 Land off Glebelands 8 Ha grassland between the western edge of Benfleet urban area and the A130, north of the Sadlers Farm roundabout. THREE: GB5 Land west of Benfleet 39 Ha grassland with some wooded areas and limited industrial activity between the western edge of Benfleet urban area and the A130, south of the Sadlers Farm roundabout. In summary: My stance is that while housing is needed, GB8 is not the appropriate location for such a large-scale development due to its significant impact on the local environment, infrastructure, and the community's quality of life. I support development on alternative sites that would cause less disruption and better align with the area’s infrastructure and community needs.											

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0257-0001	Individual	Hayley	Mener		Not Stated	SP3	Not Stated	I strongly object any type of building and planning on the Salvation Army Field: GB8 and any of the other sites in Hadleigh. The capacity of the local infrastructure is already at breaking point. Monday to Friday during the hours of people going to work and the school runs and, on the weekends, it can be absolute grid lock from Morrisons down to Hadleigh / Leigh on Sea. The constraints on the Hadleigh – London Road would only compound with more houses with the developments proposed. Local roads already suffer from congestion at key junctions, so would be impossible to accommodate the additional traffic demands arising from 2500 new houses. Key points for objection include: * 1. Green Belt and open spaces are protected and of all the green belt spaces for development, GB8 should be rejected. * 2. GB8 is a place of peace, open spaces, beautiful historic landscape and provides recreational value to the whole community. * 3. GB8 has the buried remains of a Roman fort, Heritage Category: Scheduled Monument See appendix 1 * 4. GB8	Not Stated	Not Stated				Not Stated		No	A	Objects to any type of building and planning on the Hadleigh Salvation Army Field: GB8. The capacity of the local infrastructure is already at breaking point, particularly Monday to Friday during the hours of people going to work and the school runs, and, on the weekends, it can be absolute grid lock from Morrisons down to Hadleigh / Leigh on Sea boarder, which can take 10 minutes to travel 2 miles. The constraints on the Hadleigh – London Road would only compound with more houses with the development. Local roads already suffer from congestion at key junctions, which means that they may be unable to accommodate the additional traffic demands arising from significant new housing growth. Key points from your objection include:	Comments noted	N

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								is a historic site with 1891 of history and ownership under The Salvation Army, they should be keeping what's left as green belt. The Salvation Army acquired the land to serve the local community, selling parcels of land for large housing developments would destroy the natural beauty that the community enjoys and the wildlife habitat. * 5. GB8 Development would severely overload local roads and infrastructure. The roads are already full of pot holes which would only get worse, the council can't keep up with repairs as it is. * 6. GB8 Development would create unacceptable strain on the small residential roads & London Road especially at peak times and weekends causing stress in the community. * 7. GB8 The current infrastructure of Hadleigh would not be able to cope with the development of 64Ha! * 8. GB8 The development just doesn't make any common sense to the current demand on the area. Castlepoint have better and more suitable options such as GB16 which has the benefit of A127 & isn't disrupting anyone * 9. I doubt								1. Green Belt and open spaces are protected and of all the green belt spaces for development, GB8 should be rejected. 2. GB8 is a place of peace, open spaces, beautiful historic landscape and provides recreational value to the whole community. 3. GB8 has the buried remains of a Roman fort, Heritage Category: Scheduled Monument 4. GB8 is a historic site with 1891 of history and ownership under The Salvation Army, they should be keeping what's left as green belt at all costs. The Salvation Army purchased the land to serve the local community, selling parcels of land for large housing developments does not serve the community - period. 5. GB8 Development would severely			

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								GB8 will offer affordable housing, the “builders” will likely build high-end houses taking full advantage of the Thames River, Estuary views and Kent views. This is prime land for a builder and will not be sold off cheap. You know this! * 10. GB8 development would have considerable impact on the existing local services, dentists, doctors and schools; The King John School, Hadleigh Junior School, Hadleigh Infants and Nursery School & Wrstwood are already at full capacity. Doctors and dentist clinics that are already over subscribed and not taking on any new patients and the waiting times for an EMERGENCY appointment is currently 6 weeks at the dentist! If I was to support any development of the development of Green Belt, it would these three options, being in order of preference below. Development of the GB16 (160Ha) site in Northwest Thundersley should be the council’s obvious option for housing development. Here's a breakdown of the key points and rationale: * 1. Minimal Impact on Local Services and Infrastructure: o o Developing the GB16 site would have limited impact								overload local roads and infrastructure. 6. GB8 Development would create unacceptable strain on the London Road at peak times and weekends. 7. GB8 The current infrastructure of Hadleigh would not be able to coupe with the development of 64Ha! 8. GB8 The development just doesn’t make any common sense to the current demand on the area. Castlepoint have better and more suitable options 9. GB8 will not be affordable housing, the land will be sold as a premium, the “builders” will build high-end houses taking full advantage of the Thames River, Estuary views and Kent views. This is prime land for a builder and will not be sold off cheap. You know this! 10. GB8 development would			

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								on local roads, high streets, schools (both primary and secondary), children's nurseries, and medical services (doctors/dentists). Due to the site's location, it is not in an area of high congestion or near densely populated community centres so services would be more widely spread. * 2. Proximity to Major Roads (A13 and A127): o o Easy access to major roads such as the A13 and A127 is highlighted as a key advantage. These routes would provide convenient transportation links for new residents, reducing strain on smaller local roads and possibly avoiding further traffic congestion in Hadleigh town centre. * 3. Government Housing Targets: o o The GB16 site, with its 160 hectares of land, would help meet the government's housing targets for new builds. * 4. Large Plot of Land: o o The GB16 plot is larger than what is potentially required, as the council has indicated a need for 120 hectares. This surplus of space could provide additional opportunities for developers to include community benefits such as green spaces, infrastructure improvements, or other amenities such as its own								have considerable impact on the existing local service and schools; The King John School, Hadleigh Junior School, Hadleigh Infants and Nursery School. Plus, doctors and dentist clinics that are already over subscribed and not taking on any new patients. 11. With 17 other green belt sites for consideration, then there is absolutely no reason or rational for the council to choose GB8. If I was to support any development of the development of Green Belt, it would these three options, being in order of preference below. ONE: GB16 Northwest of Thundersley 160 Ha collection of “plotlands” north of the Benfleet urban area on the junction of A127/ A130/ A1245. The Council could aim to achieve the			

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								health centre. * 5. Opportunity for Large Developers: o o Major property developers like Redrow, Taylor Wimpey, Barratt, Bellway, Persimmon, are likely candidates for this project. Given their significant profits, it is argued they should reinvest in the community, potentially funding new schools, parks, and other facilities as part of the development. * 6. Green Belt Consideration: o o While green belt land is generally protected, the argument acknowledges that if green belt development is necessary, GB16 offers a suitable option due to its size and potential benefits to the area. * 7. Win-Win: o o The case that the GB16 site could be developed responsibly, with minimal negative impact on existing local infrastructure and services, while also providing an opportunity for developers to contribute to community improvements makes for a good argument. This could be a win-win for both the council in meeting its housing obligations and for the developers in building large-scale projects. Reference consultation document. Quote: “issues-and-options-consultation-								amount of housing set out in the Government’s standard methodology (7,100 new homes 2023-2043). Of this 3,727 would be in the urban area as per Option 1, leaving 3,373 that would have to be met in the Green Belt. This is 2,000 more in total than in Option 2a, and would require approximately 70 additional hectares of land (120 Hectares in total) in order to be delivered” GB16 @ 160Ha, could support the housing target of 3,373 (Green Belt) with 120Ha and leaves 40Ha for the “builders” to contribute to new services and school, etc... If the site delivered 3,373 homes with an average selling price of £400,000 that’s £1.3 billion pounds of sales. TWO: GB4 Land off Glebelands 8 Ha grassland between the western edge of Benfleet urban area			

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								document-final-web-version” Page 52; Option 3 – Release significant Green Belt land to meet standard methodology housing need “The Council could aim to achieve the amount of housing set out in the Government’s standard methodology (7,100 new homes 2023-2043). Of this 3,727 would be in the urban area as per Option 1, leaving 3,373 that would have to be met in the Green Belt. This is 2,000 more in total than in Option 2a, and would require approximately 70 additional hectares of land (120 Hectares in total) in order to be delivered” GB16 @ 160Ha, could support the housing target of 3,373 (Green Belt) with 120Ha and leaves 40Ha for the “builders” to contribute to new services and school, etc... If the site delivered 3,373 homes with an average selling price of £300,000 that’s £1 billion pounds of sales. ONE: GB16 Northwest of Thundersley 160 Ha collection of “plotlands” north of the Benfleet urban area on the junction of A127/ A130/ A1245. There are existing low density industrial units and homes within this area. TWO: GB4 Land off Glebelands 8 Ha grassland between the								and the A130, north of the Sadlers Farm roundabout. THREE: GB5 Land west of Benfleet 39 Ha grassland with some wooded areas and limited industrial activity between the western edge of Benfleet urban area and the A130, south of the Sadlers Farm roundabout. In summary: My stance is that while housing is needed, GB8 is not the appropriate location for such a large-scale development due to its significant impact on the local environment, infrastructure, and the community's quality of life. I support development on alternative sites that would cause less disruption and better align with the area’s infrastructure and community needs.			

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								western edge of Benfleet urban area and the A130, north of the Sadlers Farm roundabout. THREE: GB5 Land west of Benfleet 39 Ha grassland with some wooded areas and limited industrial activity between the western edge of Benfleet urban area and the A130, south of the Sadlers Farm roundabout In summary: My stance is that while housing is needed, GB8 is not the appropriate location for such a large-scale development due to its significant impact on the local environment, infrastructure, and the community's quality of life. I support development on alternative sites that would cause less disruption and better align with the area's infrastructure and community needs.											

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0334-0003	Organisation	Gle nn	Smit h	ACT Road ways ltd		For eword	No		No		For clarity A.C.T Roadways Ltd unsound submission related to the correct version of the Local Plan. A.C.T Roadways Ltd have since & after the event noticed other significant documents which were neither available to the committee on 23rd July 2025 when the Reg 19 was unanimously voted through! Nor publicly available / displayed or notified to the residents and or businesses of Castle Point. Those documents were both produced in August 25. They are:- attached.to this email with a synopsis and reasoning below. 1. The housing capacity Topic Paper of August 2025 2. CPBC Statement of Common Ground Castle Point Plan 2026 to 2043 Regulation 19 Pre-Submission Draft Re Land East of Manor Trading Estate, Benfleet Between Castle Point Borough Council and Essex County Council Of August 25 Further and of significance Re The housing Capacity Topic Paper of August 2025. Meta Data indicates that this PDF was converted on 15th August 2025. 23 days				Yes - see attachment	No ne	State that significant documents which were neither available to the committee on 23rd July 2025 when the Reg 19 was unanimously voted through! Nor publicly available / displayed or notified to the residents and or businesses of Castle Point. Those documents were both produced in August 25. They are:- attached.to this email with a synopsis and reasoning below. 1. The housing capacity Topic Paper of August 2025 2. CPBC Statement of Common Ground Castle Point Plan 2026 to 2043 Regulation 19 Pre-Submission Draft Re Land East of Manor Trading Estate, Benfleet Between Castle Point Borough Council and Essex County Council Of August 25 Further and of significance	Noted	N

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											after the committee voted on 23rd July & 14 days after the Reg 19 consultation commenced. Conclusion This was not available to either councillors or the public. Re the statement of common ground, is entitled “Regulation 19 Pre-Submission Draft” it is clearly not a document that was produced pre the Reg 19 approval! The Reg 19 consultation closed on 26th Sept 2025, this document was not only not available it was not produced until the earliest in August 2025 – albeit it has no meta data that identifies the true date of the agreement, it transpires the PDF was created 30/09/2025 but regardless of when it was first discussed or a topic on conversation it was not agreed until 29th September 3 days after the closing date of the regulation 19 consultation.						Re The housing Capacity Topic Paper of August 2025. Meta Data indicates that this PDF was converted on 15th August 2025. 23 days after the committee voted on 23rd July & 14 days after the Reg 19 consultation commenced. Conclusion This was not available to either councillors or the public. Re the statement of common ground, is entitled “Regulation 19 Pre-Submission Draft” it is clearly not a document that was produced pre the Reg 19 approval! The Reg 19 consultation closed on 26th Sept 2025, this document was not only not available it was not produced until the earliest in August 2025 – albeit it has no meta data that identifies the true date of the agreement, it transpires the PDF was created 30/09/2025 but		

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																	regardless of when it was first discussed or a topic on conversation it was not agreed until 29th September 3 days after the closing date of the regulation 19 consultation.		
0941-0001	Organisation	Izzi	Henderson	Anchor Hanoi Group	Yes	HOU4	Yes		No	Effective	Anchor is England's largest provider of specialist housing and care for those in later life. We fully support setting a clear target for homes for older people, divided between retirement/sheltered, extra care and care homes. This approach aligns with national planning policy, which is clear that planning policies should reflect the need for different types of housing to meet the diverse needs of older people. We encourage Castle Point Council to make specific allocations for older persons' housing through its local plan policies to meet the identified need, in addition to requiring a	Make specific allocations for older persons' housing, in addition to M4(2) and M4(3) standards. Allow flexibility in housing mix for older persons' housing.	No	Not Answered	Not Answered	A	Supports HOU4 but requests that it be ammended to make specific allocations for older persons' housing through its local plan policies to meet the identified need, in addition to requiring a percentage of homes to be built to M4(2) and M4(3) standards.	Policy HOU4 makes provision for specialist housing, including the elderly, which has been based on the need identified in the Local Housing Needs Assessment 2023 and the Local Housing Needs Assessment Update 2025. By requiring M4(2) and M4(3) standards we can can also provide specialist accomodation for other needs such as	N

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											percentage of homes to be built to M4(2) and M4(3) standards. This is because accessible homes are not typically reserved for older people. When making allocations, consideration should be given to the minimum number of older persons’ homes needed on a site to ensure viability, which in Anchor’s experience is at least 65. The supporting text recognises that homes for older people will mostly be needed as one and two-bedroom properties. Anchor’s new developments typically comprise single buildings with around 70 high-quality social rent homes. Social rent homes for older people are mainly one-bedroom, as two-bedroom homes are difficult to let due to the under-occupancy charge and the predominance of single-person households. Flexibility in housing mix is therefore essential to ensure the viability and successful delivery of older persons’ housing to meet needs.														wheelchair accessible dwellings.	

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1013-0001	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	SP1	Yes		Yes		Anglian Water supports the policy requirements regarding new opportunities for green and blue infrastructure (GBI) and the multi-functional benefits well designed GBI can bring to existing and new communities, particularly in terms of climate resilience and minimising the impacts of pollution - including improved water quality. A successful trial by Anglian Water in partnership with Essex County Council, led to Park Avenue becoming the first street in Essex to have new “rain gardens” installed in 2021 to help reduce the risk of flooding. These are attractive Sustainable Urban Drainage Systems (SuDS) - that help retain water and allow it slowly to soak away and holding surface water away from the road and people’s homes. Thirty native trees were planted in the greenspace, and over 1,300 plants in the rain gardens to help to reduce localised flooding in the area and provide an environmentally positive solution for the local community.		No	Not Answered	Not Answered	A	Anglian Water supports the policy requirements regarding new opportunities for green and blue infrastructure (GBI) and the multi-functional benefits well designed GBI can bring to existing and new communities, particularly in terms of climate resilience and minimising the impacts of pollution - including improved water quality. Anglian Water have completed successful trials in partnership with Essex County Council, installing “rain gardens” SuDS help reduce the risk of flooding. In addition, Anglian Water has delivered a new mycelium wetland at Benfleet water recycling centre (WRC), in partnership with the University of Essex who will be monitoring the performance of this innovative wetland	Support noted	N

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											In addition, Anglian Water has delivered a new mycelium wetland at Benfleet water recycling centre (WRC), in partnership with the University of Essex who will be monitoring the performance of this innovative wetland design. This wetland is designed to treat settled storm discharge from the WRC using nature-based solutions that increase biodiversity, improve water quality, and reduce the algal bloom to allow the protected salt marshes (Ramsar and SSSI sites) to thrive. Further information can be found here: https://www.catchmentto.coast.uk/places/benfleet-creek/ We therefore endorse the creation of GBI either retrofitting in existing communities as part of redevelopment and urban regeneration opportunities and creating GBI in new developments. Our Advanced WINEP investment for AMP8 aims to demonstrate an approach to maximise value by going even further for the environment through partnership working (including leveraging							design.	Anglian Water therefore endorse the creation of GBI either retrofitting in existing communities as part of redevelopment and urban regeneration opportunities and creating GBI in new developments.		

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											significant partnership funding), focus on the use of nature-based solutions, implementing solutions to water management challenges at scale, and improved multi-stakeholder governance. The ways of working development through the partnership centre of excellence will be applied to the delivery of our overflows WINEP obligations in Great Yarmouth and Southend. We are aiming to deliver 100% green solutions in partnership - achieving both positive overflow outcomes and wider benefits such as flood mitigation. It is hoped that learning from A-WINEP can be applied to other areas in the future, to demonstrate that partnership funding opportunities can provide significantly greater social, environmental, and economic benefits to an area.								

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0259-0001	Individual	Zoe	Love day		Yes	SP3	No	Dear Sir/Madam, This is my own personal response to the Castle Point Plan Regulation 19 Draft consultation. I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No	Not Stated	No		Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment	N

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											operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						emergency evacuation procedures. Object to proposals for residential on Charfleets.	(SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	

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0259-0002	Individual	Zoe	Love day		Yes	C4	No	, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No	Not Stated	No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0260-0001	Individual	Natalie	Osborne		Yes	SP3	No	Dear Sir/Madam, This is my own personal response to the Castle Point Plan Regulation 19 Draft consultation. I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, Consistent with National Policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led The inclusion of	Add North West Thundersley site	Not Stated	Not Stated	No	A	Fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable	North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. Green Belt/Grey belt covered	N

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											the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	under policy GB2. Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	
0260-	Individual	Natalie	Osborne		Yes	C4	No	, and the number of Canvey West homes puts residents in the East at risk with	No	Not Stated			Not	Not Stated	No	A	The number of Canvey West homes puts	Needs of emergency services	N

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0002								emergency evacuation procedures.					Stated				residents in the East at risk with emergency evacuation procedures	considered in the supporting Infrastructure Delivery Plan (IDP).	
0261-0001	Individual	Dawn	Bennett		Not Stated	SP3	No	I am responding as an individual resident and prefer to send my consultation response rather than complete the confusing online version. My response is in the main body of this email. I have only lived on Canvey for two years but it is quite obvious that is unable to sustain any additional building with the current infrastructure. Insurance premiums are already increased due to being a flood risk area and it will be impossible for anyone to evacuate off the Island if there is an emergency. The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially	No		Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government's target and	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth.	Not Stated	Not Stated	No	A	Objections on: • 5 Year housing supply - Not identified as required under NPPF 78. • Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution. • SA - NW Thundersley not adequately assessed. • Biodiversity - No enforceable delivery mechanisms or implementation pathways to address NPPF 180. Mitigation measure identified but theoretical rather than practical. • Canvey: Concerns over flood risk. SUDS must be designed with a full understanding of Canvey's unique drainage context. • Green Belt:	• Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide

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								acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council’s decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However,I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded ‘Blinking Owl Site’. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without			needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government’s housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government’s impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has						Welcome decision not to include green belt sites. • North West Thundersley should have been included.	evidence. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options also have been considered through the the SFRA. Comments noted.	for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including			been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels,								

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								surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council’s removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft,			tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey’s ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council’s plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary,								

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								there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan’s credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these			the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial								

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								shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.			strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island’s geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council’s commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey’s unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased								

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											and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site’s residents desperately								

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											need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making								

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											powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This								

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											scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in								

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											partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council's own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West								

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											Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive								

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											areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan’s soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland’s Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey								

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											Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0261-0002	Individual	Dawn	Bennett		Not Stated	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No				Not Stated	Not Stated	No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0262-0001	Individual	John	Bennett		Not Stated	SP3	No	I am responding as an individual resident and prefer to send my consultation response rather than complete the confusing online version. My response is in the main body of this email. I have only lived on Canvey for two years but it is quite obvious that is unable to sustain any additional building with the current infrastructure. Insurance premiums are already increased due to being a flood risk area and it will be impossible for anyone to evacuate off the Island if there is an emergency. The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong	No		Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate.	Not Stated	Not Stated	No	A	Objections on: • 5 Year housing supply - Not identified as required under NPPF 78. • Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution. • SA - NW Thundersley not adequately assessed. • Biodiversity - No enforceable delivery mechanisms or implementation pathways to address NPPF 180. Mitigation measure identified but theoretical rather than practical. • Canvey:	• Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and

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								sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known. Also, significantly there are effectively only three highways access routes in and out of the Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council’s decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However,I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known			on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government’s target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government’s housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified. Although to many residents and observers it is obvious that our area cannot meet the Government’s impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be		North West Thundersley offers a strategic opportunity for sustainable growth.					Concerns over flood risk. SUDS must be designed with a full understanding of Canvey’s unique drainage context. • Green Belt: Welcome decision not to include green belt sites. • North West Thundersley should have been included.	currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. • Biodiversity: Covered under Policy ENV3 – Biodiversity and Nature Recovery, which includes mitigation and delivery mechanisms. • Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options also have been considered through the the	have regard to Essex County Council’s SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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								as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and the consultations on the Plan well-advertised, I find the Regulation 19 consultation difficult to engage with due to its length and complexity.I have attempted to answer all the questions in the consultation, and would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it			fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability. Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of Flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures								SFRA. Comments noted.	

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								is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council’s removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning			routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island’s unique geography and drainage infrastructure. The island’s low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey’s ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council’s plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are								

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								Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan’s credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government’s housing targets, or indeed the Council’s own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan’s position but also leaves all of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by			compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence								

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								infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest.			base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island's geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council's commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey's unique drainage context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. The reliance								

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											on inadequate traffic routes to the Proposed Canvey West development, Haven Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of								

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											housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site's residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the								

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											need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more								

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											suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to								

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											policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable, subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the									

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											Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and								

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											inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages – one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan’s soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland’s Green Belt. The Inspector								

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											found that approach totally unacceptable due to the Flood Risk issue. This latest version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
0262-0002	Individual	John	Bennett		Not Stated	For word	No	A key statutory requirement is the 'Duty to Cooperate'. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of	No				Not Stated	Not Stated	No	A	Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Common Ground should be used to evidence this cooperation. In Castle Point's case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone.											
0263-0001	Individual	David	Mahoney		Not Stated	Had 4	Not Stated	Good morning I would like to object to building on Had4 in scrub lane.	Not Stated	Not Stated			Not Stated	Not Stated	No		Objects to building on Had4 in scrub lane.	Objection noted	N
0264-0001	Individual	Carole	Ferguson		Yes	SP3	No	Dear Sir/Madam, This is my own personal response to the Castle Point Plan Regulation 19 Draft consultation. I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, consistent with National Policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No	Not Stated	No		Doesn't meet the housing target for Castle Point. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. Add North West Thundersley site, 187Ha, a Greenbelt/Grey Belt/Brownfield site option. NPPF guidelines state that development	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-

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											directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island’s unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no							should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Object to proposals for residential on Charfleets.		2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement ' the Council will	blue infrastructure network, and have regard to Essex County Council’s SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA) .

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											reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes. The access roads onto Canvey Island are not sufficient at the present time. A further road(s) must be a priority in order to even consider further housing on the Island. Most of the roads around the Island are also not standard width which causes problems navigating the area. Consideration as to how the Island's roads would cope with the copious amount of building traffic that would need to access the Island would need to be a further priority.							seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	
0264-0002	Individual	Carole	Ferguson		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Not Stated				No	Not Stated	No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0265-0001	Individual	Richard	Bates		Not Stated	Had 4	Not Stated	Hi there, Hope you're keeping well! I am getting in touch to make a request if possible please? I would like to be informed of any previous applications to build on the Land South of Scrub Lane which is next to Hadleigh Infants and Nursery School. I am a local resident who wants to gain a full understanding as to what these applications	Not Stated				Not Stated	Not Stated	No		Wishes to be notified about planning applications on Land South of Scrub Lane.	Planing applications are advertised locally in accordance with national regulations and can be checked on the Council's website here https://www.castlepoint.gov.uk/fi	N

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								entailed (use, number of properties etc.) and why they were eventually rejected. Please feel free to send over any previous documentation relating to these proposals. Have a nice weekend and thanks in advance for your cooperation										nd-planning-applications/	
0266-0001	Supporting Evidence provided to supplement representation. See representation 0992-0001 to 0992-0005.																Submitted a Vision and Masterplan Document in relation to Land at Solby Wood Farm:	Noted.	N
0267-0001	Individual	Amy	Dawson		Not Stated	SP3	No	To Whom It May Concern, I wish to express my objection to the Castle Point Plan Regulation 19 Draft, which I believe is non-compliant due to its failure to adequately consider alternative, potentially more strategic, locations for housing development. The proposed site selection appears to disregard the updated National Planning Policy Framework (NPPF) guidance on greenbelt and grey belt land.	Not Stated	Not Stated	This raises serious concerns about the risk of speculative development on protected greenbelt areas, which are vital for preserving local ecology and biodiversity. The plan disproportionately targets Canvey Island for development, despite significant infrastructure constraints. Overdevelopment in this area will exacerbate issues related to highways, traffic, drainage, sewage, and flood risk.	I urge the Council to consider more balanced alternatives, such as North West Thundersley, which could meet housing needs without placing undue pressure on urban and environmentally sensitive areas. Please take into account the limited conservation and green spaces remaining on Canvey Island, and the long-term impact this plan may have on infrastructure and wildlife.	No	Not Stated	No	A	* Fails to consider all alternative locations for housing development. * Disregards the updated National Planning Policy Framework (NPPF) guidance on greenbelt and grey belt land. * The plan disproportionately targets Canvey Island for development, despite significant	Consideration of All Sites: All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). Green Belt/Grey belt covered under policy GB2. Flooding and infrastructure covered by	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site

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																	infrastructure constraints. Overdevelopment in this area will exacerbate issues related to highways, traffic, drainage, sewage, and flood risk. * Urges Council to consider North West Thundersley, which could meet housing needs without placing undue pressure on urban and environmentally sensitive area * Please take into account the limited conservation and green spaces remaining on Canvey Island, and the long-term impact this plan may have on infrastructure and wildlife.	policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. North-West Thundersley: Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
1013-0002	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	SP4	Yes		Yes		Anglian Water supports the policy requirement to demonstrate that there is sufficient appropriate infrastructure capacity to support development proposals, and that this capacity will be sustainable in both physical and		No	Not Answered		A	Anglian Water supports the policy requirement to demonstrate that there is sufficient appropriate infrastructure capacity to support development	Support noted	N

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											financial terms. It is considered that this policy is consistent with Policy SD9 in terms of the need for proposals to demonstrate there is adequate foul water treatment and drainage infrastructure to serve the development.						proposals, and that this capacity will be sustainable in both physical and financial terms. It is considered that this policy is consistent with Policy SD9 in terms of the need for proposals to demonstrate there is adequate foul water treatment and drainage infrastructure to serve the development.		
1013-0003	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	C1	Yes		Yes		Anglian Water supports the policy requirements, and considers the policy sound in principle, regarding town centre greening and managing flood risk through urban greening, water capture schemes and appropriate use of materials. Anglian Water has been involved in partnership schemes to retrofit SuDS in Canvey to address surface water flood risk in the town, and therefore we consider that future growth and redevelopment of sites in the town should include appropriate SuDS through urban greening to provide overall betterment for the existing community. These types of schemes can provide additional opportunities for	Anglian Water recommends that the policy should identify the need for SuDS (consistent with Policy SD3), particularly nature-based solutions such as rain gardens. The Urban Greening Scenario set out in the SFRA Surface Water Modelling Technical Note identifies that the potential impact of SuDS interventions could result in 10% reduction in contributing flows from the urban drainage network. Although this is not seen to have a significant impact on flood risk in Canvey Island, we would welcome further investigation on what measures would benefit the area.	No	Not Answered		A	Anglian Water supports the policy requirements, and considers the policy sound in principle, regarding town centre greening and managing flood risk through urban greening, water capture schemes and appropriate use of materials. Anglian Water has been involved in partnership schemes to retrofit SuDS in Canvey to address surface water flood risk in the town, and therefore we consider that future growth and redevelopment of	Policy SD3 requires all new development to incorporate water management measures to reduce surface water run-off or adverse impact on water quality and ensure that it does not increase flood risk elsewhere. Policy SD3 also states that the principal method to do so should be the use of Sustainable Drainage Systems (SuDS). Supporting paragraph 21.37 states that 'Well-	Policy C1 - Canvey Town Centre Amendment to Part 11 The inclusion of appropriate SuDs to manage surface water flood risk in the town, to provide betterment for the commu

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											regeneration including enhanced public realm, positive health and wellbeing benefits, improving biodiversity and air quality. Anglian Water would welcome engagement in the preparation of the Canvey Town Centre Master Plan to assist with the appropriate management of surface water, following the drainage hierarchy.						sites in the town should include appropriate SuDS through urban greening to provide overall betterment for the existing community. These types of schemes can provide additional opportunities for regeneration including enhanced public realm, positive health and wellbeing benefits, improving biodiversity and air quality. Anglian Water would welcome engagement in the preparation of the Canvey Town Centre Master Plan to assist with the appropriate management of surface water, following the drainage hierarchy.	designed SuDS can contribute significantly towards the urban greening factor requirements set out in policy ENV3 SuDS can also contribute to climate change adaption and water efficiency, through provision of rainwater harvesting to assist in water capture to reducing risk of flooding and reduce water demand'.Policy C1 part 11 notes that the new Canvey Town Centre Master Plan will identify 'Opportunities for managing flood risk through greening , water capture schemes and the appropriate use of materials to enhance the public realm, health, wellbeing, biodiversity and air quality	nity via urban Opportunities for managing flood risk through greening , water capture schemes and the appropriate use of materials to enhance the public realm, health, wellbeing, biodiversity and air quality

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1013-0004	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	C4	Yes		No	Effective	The proposal to concentrate significant growth on Canvey Island is underpinned by the SFRA Level 1 and 2 and supporting technical notes. Whilst we are aware of the challenges that tidal and surface water flood risk present, we consider that the Environment Agency and Lead Local Flood Authority (LLFA), are best placed to advise on the principle of whether these risks can be managed through suitable adaptation and mitigation measures, identified in the SFRA reports, and the recommendations proposed. Anglian Water considers that proposals for the densification of West Canvey would require a surface water drainage strategy to demonstrate the effective management of surface water flood risk across the site, with the priority for reuse and SuDS in accordance with the drainage hierarchy, and consistent with the requirements of Policy SD3. Our sewerage networks can be adversely affected by surface water flooding, which can cause further impacts such as hydraulic overloading – leading to spills and pollutions.	Policy C4 should require a surface water drainage strategy to demonstrate the effective management of surface water flood risk across the site, with the priority for reuse and SuDS in accordance with the drainage hierarchy, and consistent with the requirements of Policy SD3. The supporting text should also reference the need for pre-application engagement with Anglian Water if a connection to the public surface water sewerage system is proposed.	No	Not Answered		A	The proposal to concentrate significant growth on Canvey Island is underpinned by the SFRA Level 1 and 2 and supporting technical notes. Whilst we are aware of the challenges that tidal and surface water flood risk present, we consider that the Environment Agency and Lead Local Flood Authority (LLFA) are best placed to advise on the principle of whether these risks can be managed through suitable adaptation and mitigation measures, identified in the SFRA reports, and the recommendations proposed. Anglian Water considers that proposals for the densification of West Canvey would require a surface water drainage strategy to demonstrate the effective management of surface water flood	Mods proposed	Policy C4 - West Canvey Modification to Policy: New Paragraph 2. A surface water drainage strategy to demonstrate the effective management of surface water flood risk across the site, with the priority for reuse and SuDS in accordance with the drainage hierarchy.

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											Connection to our surface water sewer network should be the final option for discharge, if all other options are demonstrated to be infeasible. Our surface water guidance sets out our approach to different development scenarios. Reference to urban greening and the introduction of sustainable drainage is made in paragraph 8.39 of the supporting text, and pre-application discussions with the Lead Local Flood Authority. We would therefore expect the policy to reflect this approach in more specific terms or at least refer the need for compliance with Policy SD3. Moreover, the supporting text should also reference the need for pre-application engagement with Anglian Water if a connection to the public surface water sewerage system is proposed.						risk across the site, with the priority for reuse and SuDS in accordance with the drainage hierarchy, and consistent with the requirements of Policy SD3. Our sewerage networks can be adversely affected by surface water flooding, which can cause further impacts such as hydraulic overloading – leading to spills and pollutions. Connection to our surface water sewer network should be the final option for discharge, if all other options are demonstrated to be infeasible. Our surface water guidance sets out our approach to different development scenarios.Reference to urban greening and the introduction of sustainable drainage is made in paragraph 8.39 of the supporting text, and pre-application discussions with the Lead Local			Modifications to Supporting Text 8.39 To ensure environmental quality, and to reduce the risks of adverse impacts from surface water, hydraulic overloading and pollution, it is expected that the regeneration of west Canvey will include urban greening and the introduction of sustainable drainage - must be

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																	Flood Authority. We would therefore expect the policy to reflect this approach in more specific terms or at least refer the need for compliance with Policy SD3. Moreover, the supporting text should also reference the need for pre-application engagement with Anglian Water if a connection to the public surface water sewerage system is proposed. Proposed Modifications: Policy C4 should require a surface water drainage strategy to demonstrate the effective management of surface water flood risk across the site, with the priority for reuse and SuDS in accordance with the drainage hierarchy, and consistent with the requirements of Policy SD3. The supporting text should also reference the need for pre-application		supported by a surface water drainage strategy. The Strategy will be fully informed by engagement with key partners including the Environment Agency, Water utilities companies and Essex County Council (as Lead Local Flood Authority) and will prioritise consideration of SuDS and urban greenin

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																	engagement with Anglian Water if a connection to the public surface water sewerage system is proposed.		g. 8.40 SuDS should be the principal but may not be the only method. SuDs are often most viable when considered early in the design process, so developers are encouraged to engage in preapplication discussions with Essex County Council (as Lead Local Flood Authority), and refer to ECC's SuDS

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																			Design Guide, and any future updates , when preparing applications incorporating SuDS schemes. These are critical to address the impacts of climate change in an urbanised environment and especially in a low-lying area such as Canvey. Furthermore, it is expected that the develop

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																			ment will integrate with multifunctional green infrastructure in the area such as Canvey Wick SSSI and west Canvey Marshes to provide recreation and time in nature opportunities for residents. Developers should engage with Anglian Water as early in the process as possible, if a connection to the public

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																			surface water sewerage system is proposed).
1013-0005	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	Policies Map	Yes		No	Justified	Anglian Water supports the principle of the Green Lung designation in helping to support nature recovery on Canvey Island and consistency with the aims of the Local Nature Recovery Strategy for Essex. However, whilst our Canvey Island water recycling centre (WRC) is mainly excluded from the Green Lung designation on the Policies Map, it does not reflect all our operational land for this site. Our landownership for Canvey Island WRC extends further than shown on the Policies Map and includes part of the access to our site and a strip of land that contains the final effluent pipe extending from the south of the WRC to the coastline.	Anglian Water requests that the Policies Map excludes the entirety of our WRC operational land from the land indicated as 'Green Lung' (and any overlapping area identified as 'Park Homes' sites) to ensure that future operational or engineering works required in relation to maintaining or improving our essential wastewater infrastructure is not constrained by the designation. Anglian Water can provide the Council with details of our operational land/landownership for this site to assist with accuracy of the Policies Map and the attributed land designations.	No	Not Answered		A	Modification: Policies Map to be modified in accordance with Anglian Water operational land/land ownership mapping, as illustrated on the SoCG:	Modification: Policies Map to be modified in accordance with Anglian Water operational land/land ownership mapping, as illustrated on the SoCG:	Y - Policies Map to be modified in accordance with Anglian Water operational land/land ownership mapping, as illustrated on the SoCG:

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1013-0006	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	Chapter 9	Yes		Yes		NOTE Consistency issue: Anglian Water recognises there are a number of redevelopment and regeneration opportunities within the town, at various sites. Some of the site allocation policies (Policy B3, B5, B6) includes the requirement that "the development proposal is compliant with all other relevant policies of this Plan"; however, none of the other site allocations for Benfleet include this requirement. We question whether all allocation policies require this criterion to ensure that the plan is read as a whole, or whether specific policy requirements such as the submission of a surface water drainage strategy should be specifically included? Similarly, the supporting text (paragraph 9.30) Policy B8 Manor Trading Estate references the inclusion of urban greening and introduction of sustainable drainage, but the policy includes no such requirement. The SFRA Level 2 recommendations stated that for all proposed development sites "peak surface water runoff rate from the development must be as close as reasonable practicable to the	Consistency issue between policies in relation as to whether a surface water drainage strategy should be required or a clause requiring "development proposals to be compliant with all other relevant policies of this Plan".	No	Not Answered		A	NOTE Consistency issue: Anglian Water recognises there are a number of redevelopment and regeneration opportunities within the town, at various sites. Some of the site allocation policies (Policy B3, B5, B6) includes the requirement that "the development proposal is compliant with all other relevant policies of this Plan"; however, none of the other site allocations for Benfleet include this requirement. We question whether all allocation policies require this criterion to ensure that the plan is read as a whole, or whether specific policy requirements such as the submission of a surface water drainage strategy should be specifically included? Similarly, the supporting text (paragraph 9.30) Policy B8 Manor Trading Estate	NPPF paragraph 16 states that Plans should avoid unnecessary duplication of policies that apply to a particular area. Policies should not be read in isolation, and the Castle Point Plan is to be read as a whole.	<u>Modification to policies B5 and B6</u> Remove sentence 'The proposal is compliant with all other relevant policies of this Plan' Note the similar sentence in Policy B3 is retained since it specifically also refers to another policy (B2).

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											greenfield runoff rate...[and] Development proposals must demonstrate that the surface water will be managed and discharged from the site in accordance with the drainage hierarchy." This would suggest that either all the policies require the submission of a surface water drainage strategy that demonstrates that peak surface water runoff rates are no greater than equivalent greenfield runoff rates and the discharge of the surface water should be managed in accordance with the drainage hierarchy OR are consistent with the requirements of Policy SD3.						references the inclusion of urban greening and introduction of sustainable drainage, but the policy includes no such requirement.The SFRA Level 2 recommendations stated that for all proposed development sites "peak surface water runoff rate from the development must be as close as reasonable practicable to the greenfield runoff rate...[and] Development proposals must demonstrate that the surface water will be managed and discharged from the site in accordance with the drainage hierarchy." This would suggest that either all the policies require the submission of a surface water drainage strategy that demonstrates that peak surface water runoff rates are no greater than equivalent		

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																	greenfield run-off rates and the discharge of the surface water should be managed in accordance with the drainage hierarchy OR are consistent with the requirements of Policy SD3.		
1013-0007	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	HA D4	Yes		Yes		NOTE Consistency issue: Anglian Water recognises there are a number of redevelopment and regeneration opportunities within the town, at various sites. This site allocation policy includes the requirement that "the development proposal is compliant with all other relevant policies of this Plan"; however, none of the other site allocations for Hadleigh include this requirement. We question whether all allocation policies require this criterion to ensure that the plan is read as a whole, or whether specific policy requirements such as the submission of a surface water drainage strategy (in accordance with Policy SD3) is required. Whilst surface water flood risk is not identified in the supporting text the SFRA Level 2 recommendation suggests all proposed development sites would need to demonstrate that	Consistency issue between Hadleigh site allocation policies in relation as to whether a surface water drainage strategy should be required or a clause requiring "development proposals to be compliant with all other relevant policies of this Plan".	No	Not Answered		A	Consistency issue: Anglian Water recognises there are a number of redevelopment and regeneration opportunities within the town, at various sites. This site allocation policy includes the requirement that "the development proposal is compliant with all other relevant policies of this Plan"; however, none of the other site allocations for Hadleigh include this requirement. We question whether all allocation policies require this criterion to ensure that the plan is read as a whole, or whether specific policy requirements such	Agreed in Anglian Water SoCG as unnecessary and inconsistent with other policies. NPPF paragraph 16 states that Plans should avoid unnecessary duplication of policies that apply to a particular area. Policies should not be read in isolation, and the Castle Point Plan is to be read as a whole. Modification to Policy Had4 Remove sentence 'The proposal is compliant with all other relevant policies of this Plan'	Y Policy Had4 Remove sentence 'The proposal is compliant with all other relevant policies of this Plan' Note This is done for consistency between policies.

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											surface water run-off is managed and discharged in accordance with the drainage hierarchy.						as the submission of a surface water drainage strategy (in accordance with Policy SD3) is required. Whilst surface water flood risk is not identified in the supporting text the SFRA Level 2 recommendation suggests all proposed development sites would need to demonstrate that surface water run-off is managed and discharged in accordance with the drainage hierarchy.	Note This is done for consistency between policies	
1013-0008	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	THUN2	Yes		Yes		NOTE Consistency issue: Anglian Water recognises there are redevelopment and regeneration opportunities within the town, at various sites. This site allocation policy and Policy Thun 3 includes the requirement that "the development proposal is compliant with all other relevant policies of this Plan". We question whether all allocation policies require this criterion to ensure that the plan is read as a whole, or whether specific policy requirements such as the submission of a surface water drainage strategy (in accordance with Policy	Consistency issue between Thundersley site allocation policies in relation as to whether a surface water drainage strategy should be required or a clause requiring "development proposals to be compliant with all other relevant policies of this Plan".	No	Not Answered		A	NOTE Consistency issue: Anglian Water recognises there are a number of redevelopment and regeneration opportunities within the town, at various sites. This site allocation policy includes the requirement that "the development proposal is compliant with all other relevant policies of this Plan"; however, none of the other site allocations for Hadleigh include	Modification to policies Thun2 and Thun3 . Remove sentence 'The proposal is compliant with all other relevant policies of this Plan' Note This is done for consistency between policies.	Modification to policies Thun2 and Thun3 . Remove sentence 'The proposal is compliant with all other relevant policies of this Plan' Note This is

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											SD3) is required. Similarly, surface water flood risk is identified in the supporting text (para 11.16). The SFRA Level 2 recommendation suggests all proposed development sites would need to demonstrate that surface water run-off is managed and discharged in accordance with the drainage hierarchy.						this requirement. We question whether all allocation policies require this criterion to ensure that the plan is read as a whole, or whether specific policy requirements such as the submission of a surface water drainage strategy (in accordance with Policy SD3) is required. Whilst surface water flood risk is not identified in the supporting text the SFRA Level 2 recommendation suggests all proposed development sites would need to demonstrate that surface water run-off is managed and discharged in accordance with the drainage hierarchy.		done for consistency between policies.
0272-0001	Duplicate representation Received - Please see 1002-0001 to																		

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	1002-0006.																		
0273-0001	Individual	Lynette	Darcan		Not Stated	Had 4	Not Stated	I am writing to formally register my strong objection to the proposed development of 114 houses on the above-mentioned land. I cannot understand how 114 houses can realistically fit within such a small space. This level of density would result in a minimum of 228 additional vehicles on the roads, most likely far more as families grow and children become drivers. The land simply cannot accommodate the necessary car parking spaces. Inevitably, the overspill will spread onto surrounding roads, worsening the existing congestion and further reducing air quality for current residents. We have already seen the impact of a smaller development in recent years. That change alone has created serious parking and traffic issues along Scrub Lane. Residents of those new houses now park on the road, restricting traffic flow and causing frequent jams.	Not Stated		Driving along Scrub Lane has become increasingly difficult, with parked cars, sleeping policemen, and congestion making travel slow and stressful. Many residents are forced to park outside garages in Seymour Road, across driveways, and even on green areas due to lack of available parking. Traffic in this area is already unsustainable. During rush hour (from 7:00am until around 9:30am), at school drop-off times, or when there are any accidents or roadworks in the surrounding area, Scrub Lane is gridlocked. This situation will only deteriorate with an influx of at least 500 new residents. Healthcare provision is another major concern. Residents already struggle to secure doctors' appointments, yet this development would place hundreds more people onto already overstretched registers. Whilst I acknowledge the need for additional housing, the proposed figure of 114 houses is wholly disproportionate for this location and shows little consideration for existing residents.	A much smaller number, in keeping with the character and infrastructure capacity of the area, would be far more appropriate. I urge the council to reject this application in its current form and to give proper consideration to the very real concerns of local people who will be directly and adversely affected.	Not Stated		No	B - see 0273-002	Objects to proposed housing on HAD4 Land South of Scrub Lane	Comments noted.	N

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0273-0002	Individual	Lynette	Darcan		Not Stated	Had 4	Not Stated		No t St ate d		Please give a thought to the residents and those that use these roads regularly. There is insufficient parking to accommodate 114 homes as I stated earlier. In fact, if the plot was used solely for parking it would not be able to accommodate 114+ cars! Where are the residents of those 114 dwellings going to park? What about their visitors? What about the health professionals? Where are the parents going to park to drop off their children to Hadleigh Infant School? During busy times or if there is any accidents in the area, Scrub Lane and surrounding roads are gridlocked which does not require the hinderance of another 114+ cars being parked permanently in the area. Those that live here are already parking in front of the garages of Seymour Road to help the flow of traffic in the area. I can see this becoming a huge problem. Are residents expected to park on grass verges? Or struggle to park somewhere in the surrounding area? Or do you intend to create a one way parking or one way streets. Do you want us to become like Westcliffe where it is impossible to park and move around?		No t Sta ted		No	No ne	Objects to HAD4 because: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Infrastructure Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Parking Capacity Any application for homes on this site will have to comply with policy T7 which requires the EPOA Parking Guidance (Part 1 and 2) to be implemented. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).		N

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											Also, the traffic system in the area will need to be changed. In can take up to 15 mins during busy times to get out of Scrub Lane and a further 15 mins to get out at the lights by Morrisons. Creating lots of traffic fumes that local residents have to deal with. This is not right. Also, it is almost impossible to get a doctors appointment, how are residents going to fare getting the medical help they need with another 114 (at least) people which are likely to require more than the usual care provided?								
1013-0009	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	SD1	Yes		Yes		NOTE: It is noted that the regeneration and redevelopment of brownfield sites on Canvey Island (Flood Zone 3a) will have to meet the Sequential Test and where appropriate the Exceptions Test. Whilst the measures in the policy are to ensure that new development is designed to be flood resistant and resilient, the supporting infrastructure, such as sewerage infrastructure, is likely to require significant investment and capital carbon in new infrastructure and ongoing maintenance, but will undoubtedly be at a much higher risk from the impacts of tidal flooding due to the fact our infrastructure is		No	Not Answered		A	NOTE: It is noted that the regeneration and redevelopment of brownfield sites on Canvey Island (Flood Zone 3a) will have to meet the Sequential Test and where appropriate the Exceptions Test. Whilst the measures in the policy are to ensure that new development is designed to be flood resistant and resilient, the supporting infrastructure, such as sewerage infrastructure, is likely to require	Noted	N

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											underground, and vulnerable to flood events.						significant investment and capital carbon in new infrastructure and ongoing maintenance, but will undoubtedly be at a much higher risk from the impacts of tidal flooding due to the fact our infrastructure is underground, and vulnerable to flood events		
1013-0010	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	SD2	Yes		Yes		NOTE: Whilst Anglian Water is a Risk Management Authority in terms of managing flood risks from our infrastructure, we also need to be cognisant of the impacts of new development and other forms of flood risk, such as surface water and groundwater flooding, on the resilience of our sewerage infrastructure, given our duty to ensure the area we serve is 'effectively drained'. We support the requirement for all development to integrate SuDS to contribute to the management of surface water flood risk - however this is contradicted in Policy SD3 by applying to all 'major' development (see our representation to Policy SD3). Supporting infrastructure		No	Not Answered		A	NOTE: Whilst Anglian Water is a Risk Management Authority in terms of managing flood risks from our infrastructure, we also need to be cognisant of the impacts of new development and other forms of flood risk, such as surface water and groundwater flooding, on the resilience of our sewerage infrastructure, given our duty to ensure the area we serve is 'effectively drained'. We support the requirement for all development to integrate SuDS to contribute to the	Policy SD2(9) relates to Policy SD3(1). SD3(1) states that 'all new development will be required to incorporate water management measures to reduce surface water run-off or adverse impact on water quality and ensure that it does not increase flood risk elsewhere'. It further continues that 'The principal method to do so should be the use of Sustainable Drainage Systems	N

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											for new housing and employment growth, such as our sewerage infrastructure, is likely to require significant investment and capital carbon in delivering new infrastructure and ongoing maintenance but will undoubtedly be at a much higher risk from the impacts of surface water flooding due to the fact our infrastructure is underground, and therefore vulnerable to flood events.						management of surface water flood risk - however this is contradicted in Policy SD3 by applying to all 'major' development (see our representation to Policy SD3). Supporting infrastructure for new housing and employment growth, such as our sewerage infrastructure, is likely to require significant investment and capital carbon in delivering new infrastructure and ongoing maintenance but will undoubtedly be at a much higher risk from the impacts of surface water flooding due to the fact our infrastructure is underground, and therefore vulnerable to flood events.	(SuDS).” It is therefore considered implicit in both SD2 and SD3 that SuDS is required for all development. The reference to ‘major’ development in the consulted version of Policy SD3 relates to the requirement to submit a full drainage strategy, rather than SuDS.	

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1013-0011	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	SD3	Yes		No	Effective	Anglian Water supports the policy requirements for SuDS in principle. Whilst we recognise that the LLFA is a statutory consultee for major planning applications, we would seek drainage strategies to be submitted for all major and minor development to avoid any cumulative impacts on surface water flood risk, particularly where smaller developments may seek to connect to the public sewerage network. This would be consistent with clause 9 of Policy SD2, and recommendation 5-13 in the SFRA Level 1. Our Surface Water Risk Management Guidance provides comprehensive approach to how we will assess different types of site in terms of surface water connections. https://www.anglianwater.co.uk/siteassets/developers/development-services/aws-surface-water-guide-sm.pdf For new surface water connections to an existing surface water sewer Anglian Water will need to ensure the surface water hierarchy has been followed and require developers to liaise with the Lead Local Flood Authority (LLFA) - this is an	We would recommend a policy modification to ensure that drainage strategies will be submitted for all major and minor development to avoid any cumulative impacts on surface water flood risk, particularly where smaller developments may seek to connect to the public sewerage network. Anglian Water would seek to ensure that our surface water guidance is referenced in the supporting text, so that developers/applicants are aware of the approach we use when considering surface water drainage for new development.	No	Not Answered		A	Anglian Water supports the policy requirements for SuDS in principle. Whilst we recognise that the LLFA is a statutory consultee for major planning applications, we would seek drainage strategies to be submitted for all major and minor development to avoid any cumulative impacts on surface water flood risk, particularly where smaller developments may seek to connect to the public sewerage network. This would be consistent with clause 9 of Policy SD2, and recommendation 5-13 in the SFRA Level 1. For new surface water connections to an existing surface water sewer Anglian Water will need to ensure the surface water hierarchy has been followed and require developers to liaise with the Lead Local Flood	Modification to policy SD3 2. All ~~major~~ qualifying development, will be required to submit a drainage strategy to demonstrate that the surface water hierarchy has been followed, how both on and off-site flood risk will be managed and how mitigation measures ~~should~~ will be satisfactorily integrated into the design and layout of the development. <u>New paragraph 21:35</u> Qualifying development is major development (as defined in the GPDO) and minor development which seeks to connect to the public sewerage network. <u>Consistency</u>	Y - Modification to policy SD3 2. All ~~major~~ qualifying development, will be required to submit a drainage strategy to demonstrate that the surface water hierarchy has been followed, how both on and off-site flood risk will be managed and how mitigation measures ~~should~~ will be satisfact

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required		
											essential pre-requisite to Anglian Water accepting a surface water drainage strategy. If LLFA are satisfied that, based upon evidence, no other option is feasible then a connection point may be made to the surface water sewer at a rate agreed with LLFA, subject to there being existing capacity or the provision of network reinforcement to accommodate the flow. The developer is responsible for providing the appropriate surface water disposal infrastructure. As such, all the work to determine the feasibility of a connection to the existing surface water sewer complete with all upgrades to the consented outfall is to be carried out by the developer at their cost. Anglian Water will request a planning condition to ensure no additional flow will be connected until, any identified upgrades have been delivered and sufficient capacity in the network has been demonstrated. Should network reinforcement be required because of additional surface water flow to an existing public surface					Authority (LLFA) - this is an essential pre-requisite to Anglian Water accepting a surface water drainage strategy. If LLFA are satisfied that, based upon evidence, no other option is feasible then a connection point may be made to the surface water sewer at a rate agreed with LLFA, subject to there being existing capacity or the provision of network reinforcement to accommodate the flow. Anglian Water will request a planning condition to ensure no additional flow will be connected until, any identified upgrades have been delivered and sufficient capacity in the network has been demonstrated. Should network reinforcement be required because of additional surface water flow to an existing public surface water sewer,				<u>with SFRA recommendation 5.13</u> Part 1 of Policy SD3 requires all development to reduce surface water run-off which is considered to reflect the SFRA recommendation.	orily integrated into the design and layout of the development. <u>New paragraph 21:35</u> Qualifying development is major development (as defined in the GPDO) and minor development which seeks to connect to the public sewerage network . <u>Consistency with SFRA recomm</u>

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											water sewer, Anglian Water will request a planning condition to ensure no additional flow will be connected until sufficient capacity in the network has been demonstrated. Reinforcement of the existing network, when required as a consequence of a new surface water connection, is not included within the Infrastructure Charge. These works may be requisitioned under Section 98 of the Water Industry Act 1991 or implemented by a self-lay provider under Section 151 of the Water Industry Act 1991, with the capital cost fully chargeable to the applicant. A cost and time-scale estimate can be provided for requisitioned network reinforcement. Anglian Water would seek to ensure that our surface water guidance is referenced in the supporting text, so that developers/applicants are aware of the approach we use when considering surface water drainage for new development. We agree that no developments should connect surface water discharge to the foul network. Our surface water networks are designed for the existing catchment; therefore it is assumed to							Anglian Water will request a planning condition to ensure no additional flow will be connected until sufficient capacity in the network has been demonstrated. Reinforcement of the existing network, when required as a consequence of a new surface water connection, is not included within the Infrastructure Charge. These works may be requisitioned under Section 98 of the Water Industry Act 1991 or implemented by a self-lay provider under Section 151 of the Water Industry Act 1991, with the capital cost fully chargeable to the applicant. A cost and time-scale estimate can be provided for requisitioned network reinforcement. Anglian Water would seek to ensure that our surface water guidance is					

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											have minimal residual capacity for additional flow. Once approval in principle has been reached with LLFA, detailed analysis can be undertaken to establish the receiving surface water network capacity. Detailed analysis will be required to establish whether there is existing capacity to accommodate the proposed connection and if not, to advise on the extent of network reinforcement required. The developer is responsible for providing the appropriate surface water disposal infrastructure. As such, all the work to determine the feasibility of a connection to the existing surface water sewer complete with all upgrades to the consented outfall is to be carried out by the developer at their cost. Anglian Water 21.37 Anglian Water supports the link between SuDS and water efficiency measures through rainwater harvesting and reuse. Anglian Water works with a wide range of partners through the Ofwat Innovation Fund project - Enabling Water Smart Communities, which provides useful information on opportunities for integrated water management including						referenced in the supporting text, so that developers/applicants are aware of the approach we use when considering surface water drainage for new development. We agree that no developments should connect surface water discharge to the foul network. Our surface water networks are designed for the existing catchment; therefore it is assumed to have minimal residual capacity for additional flow. Once approval in principle has been reached with LLFA, detailed analysis can be undertaken to establish the receiving surface water network capacity. Detailed analysis will be required to establish whether there is existing capacity to accommodate the proposed connection and if not, to advise on the extent of		

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											water reuse in new developments.						network reinforcement required. The developer is responsible for providing the appropriate surface water disposal infrastructure. As such, all the work to determine the feasibility of a connection to the existing surface water sewer complete with all upgrades to the consented outfall is to be carried out by the developer at their cost. Anglian Water. Anglian Water supports the link between SuDS and water efficiency measures through rainwater harvesting and reuse. Anglian Water works with a wide range of partners through the Ofwat Innovation Fund project - Enabling Water Smart Communities, which provides useful information on opportunities for integrated water management		

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																	including water reuse in new developments.		
1013-0012	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	SD6	Yes		Yes		Anglian Water supports the policy to manage and reduce pollution, particularly through water efficient design and the installation of SuDS and delivery of multi-functional green infrastructure. We welcome clause 2 which includes reference to new development being affected by an adverse effect on the environment. We deduce from this statement, that this includes introducing an 'agent of change' to an area, something which is also		No	Not Answered		A	Anglian Water supports the policy to manage and reduce pollution, particularly through water efficient design and the installation of SuDS and delivery of multi-functional green infrastructure. We welcome clause 2 which includes reference to new development being affected by an	Modification: <u>New paragraph</u> 21.56 Development proposals should be mindful of proximity to wastewater infrastructure facilities such as pumping stations and water recycling centres due to the presence of	<u>Y-Modification:</u> <u>New paragraph</u> 21.56 Development proposals should be mindful of proximit

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											alluded to in clause 3 regarding impacts on existing businesses and community facilities. NOTE: Anglian Water would suggest the supporting text could include specific reference to wastewater infrastructure facilities such as pumping stations and our water recycling centres where we seek to recommend new development (particularly residential development) avoids encroachment on our assets due to the proximity of sensitive receptors and potential loss of amenity due to odour and/or noise arising from the operation of our essential infrastructure.						adverse effect on the environment. We deduce from this statement, that this includes introducing an 'agent of change' to an area, something which is also alluded to in clause 3 regarding impacts on existing businesses and community facilities. NOTE: Anglian Water would suggest the supporting text could include specific reference to wastewater infrastructure facilities such as pumping stations and our water recycling centres where we seek to recommend new development (particularly residential development) avoids encroachment on our assets due to the proximity of sensitive receptors and potential loss of amenity due to odour and/or noise arising from the operation of our	sensitive receptors and potential loss of amenity due to odour and/or noise arising from the operation of essential infrastructure.	y to wastewater infrastructure facilities such as pumping stations and water recycling centres due to the presence of sensitive receptors and potential loss of amenity due to odour and/or noise arising from the operation of essential infrastructure.

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																	essential infrastructure.		
1013-0013	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	SD9	Yes		Yes		Anglian Water strongly supports the policy requirements. In addition to the publications referenced in the supporting text, the tighter water efficiency standard of 90 litres per person per day (l/p/d) aligns with the Shared Standards for Water Efficiency in Local Plans, which was published in June 2025. These Shared Standards set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It recommends that Local Planning Authorities (LPAs) include tighter water efficiency standards in Local Plan policies to support a clean and sustainable supply of water - essential for growth and nature recovery. https://www.anglianwater.co.uk/siteassets/developers/new-content/p--c/shared-standards-in-water-		No	Not Answered		A	Anglian Water strongly supports the policy requirements. In addition to the publications referenced in the supporting text, the tighter water efficiency standard of 90 litres per person per day (l/p/d) aligns with the Shared Standards for Water Efficiency in Local Plans, which was published in June 2025. Reference to shared standards and BREEM.	Modifications agreed as set out in Schedule of Modifications and the Statements of Common Ground of the Water Companies and Essex CC.	Y - Modifications agreed as set out in Schedule of Modifications and the Statements of Common Ground of the Water Companies and Essex CC.

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											efficiency-for-local-plans.pdf The Shared Standards recommend that LPAs include Local Plan Policies that: Require new homes to be built to more stringent standards for water efficiency than the optional Building Regulations (part G) standard of 110 litres per person per day (l/p/d). Evidence indicates that a design standard of up to 85 litres/person/day (l/p/d) for residential developments is feasible (suggests a range between 85-95 l/p/d subject to viability and feasibility). Require new, extended or redeveloped non-domestic development to aim to achieve full credits in the BREEAM water calculator. Require new major non-domestic developments to include water saving measures and water reuse in their design. These standards provide guidance and local evidence to help LPAs make a case that more stringent water efficiency policies are justified, feasible and viable as part of Water Cycle Studies and Integrated								

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											Water Management Plans that effectively manage a range of challenges across the water environment and aid nature recovery. Local Plans have a significant role in helping to deliver the sustainable use of water resources and address shorter-term water scarcity issues. LPAs can help ensure the risk of harm to habitats and deterioration to water bodies due to water scarcity is minimised by setting more ambitious, tighter water efficiency standards for new residential and non-domestic developments in local planning policy. Whilst Anglian Water is not the statutory water undertaker for Castle Point, tighter water efficiency standards mean lower flows of wastewater that consequently result in less operational carbon being expended in pumping flows through our networks and treatment at our WRCs. As a partner to the Shared Standards, we endorse the requirement for 90 l/p/d for new residential development and for all new non-household (commercial development) to meet the full credits in BREEAM's WAT 01 calculator.								

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											In terms of wastewater and policy clause 4 - we endorse this policy approach for wastewater infrastructure which aligns with similar policies in other Local Plans across our region. Anglian Water advises developers to seek early engagement on their proposals for wastewater connections. For example, we may require a sustainable point of connection to our network, particularly where a site may trigger a number of risks - such as pollution risks and CSO spills, surcharges of our network, existing flood potential and excess surface water flooding. We welcome the supporting text set out in paragraphs 21.72 - 21.76 which clearly define our role and investment in sewerage infrastructure.								
1013-0014	Organisation	Tessa	Saunders	Anglian Water Services Ltd	Yes	Policies Map	Yes		No	Justified	Our landownership for Canvey Island WRC extends further than shown on the Policies Map, which currently shows our WRC excluded from the designations. However, our landownership for the site includes part of the access to our site and a strip of land that contains the final effluent pipe extending from the south of the WRC to the coastline.	Anglian Water requests that the Policies Map excludes the entirety of our WRC operational land from the land indicated as 'Green Lung' and Park Homes to ensure that any operational or engineering works required in relation to maintaining or improving essential wastewater infrastructure is not constrained by the designation of the 'Green	No	Not Answered		A	Anglian Water landownership for Canvey Island WRC extends further than shown on the Policies Map, which currently shows our WRC excluded from the designations. However, our landownership for the site includes part of the access	Modification: Policies Map to be modified in accordance with Anglian Water operational land/land ownership mapping, as illustrated on the Schedule of Mods and the Anglian Water Statement of	Y Modification: Policies Map to be modified in accordance with Anglian Water operational

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												Lung'. Anglian Water can provide the Council with details of our operational land/landownership for this site to assist with accuracy of the Policies Map and the attributed land designations.					to our site and a strip of land that contains the final effluent pipe extending from the south of the WRC to the coastline.	Common Ground.	land/land ownership mapping , as illustrated on the Schedule of Mods and the Anglian Water Statement of Common Ground.
0276-0001	Individual	Luke	Alde n		Yes	B8	No	I am a local business on the Manor Trading Estate and have had a presence on the estate since 2006. 1st I record that I have had the opportunity to read and fully understand my neighbour "G&K Groundworks Ltd" Unsound submission. For clarity I attach a copy of G&Ks submission to this e-mail.	No	Not Stated	I record here that Manor Training Centre UK Ltd agree with G&K Groundworks Ltd.'s that the regulation 19 draft as presented is Unsound. For the record and as relayed in G&K Groundworks Ltd submission • CPBC have never engaged with me / my business about our future on this estate. • Have never informed as is on the council's regeneration web page at priority No 4 that CPBC intends to build houses on the Manor Trading Estate and move all the businesses on the MTE North of the Borough • I presume CPBC intends to compulsorily purchase my	Perhaps CPBC might remove that Regeneration Priority Frightening Statement and actually support the local business.	No		Yes, attached is G&K Groundworks ltd's response to the consultation		The regulation 19 draft as presented is Unsound. CPBC have never engaged with the business community on this estate. Have never informed as is on the council's regeneration web page at priority No 4 that CPBC intends to build houses on the Manor Trading Estate and move all the businesses on the MTE North of the Borough I presume CPBC intends to compulsorily	Policy B8 part 6 states 'A programme of renewal of the industrial and commercial building stock within the estate with the overall aim of an increase in floor space of at least 10%' Paragraph 9.28 states ' It is not the intention of the Master Plan to result in a loss of employment on this site. Overall, the Master Plan should seek a	N

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											operational property! Again, I have not been consulted at all this is very worrying and concerning. I am certainly more confused now! Where am I going to be re-homed? This Regulation 19 along with the recent green belt review indicates that the area North where we are moving to has been identified as GB16 and has been discounted as it is not a viable! Option. I would like to record my total disbelief that CPBC along with our local councillors think it's OK to treat us the MTE business community with total disrespect. Suffice – I record again that this draft plan is unsound as it has not engaged with the business on the MTE at all. Albeit we are the drivers of the local economy.						purchase my operational property! Again, I have not been consulted at all this is very worrying and concerning. Some Background G&K are the title owners of HMLR EX498233 the footprint is 1.22 ha just over 3 acre's which is except for connect packaging the largest single commercial / industrial premises on the Manor Trading Estate. Benfleet Essex. (MTE) G&K houses 28 tenants, albeit CPBC are fully aware of those tenants & business as this draft document clearly states CPBC have engaged with them all. For the avoidance of doubt and I engage with all my tenants on a at least a weekly basis not one of them has had any engagement with CPBC officers, councillors nor CPBC co-opted Deyton Bell. Fact this property	modest increase in the floor space available for industrial and commercial uses to support economic growth. This will be secured through the revised approach to design and parking.'	

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																	has warehousing & storage buildings along with separate offices and external yards • 10 units have a warehouse footprint of 2400sq ft along with attached offices of 600 sq. ft and associated attached yards of 1200 sq. ft • 3 Units of 1200 sq. ft with 300 sq. ft office & 600 sq. ft of attached rear yard • It has 1 exceptionally large yard of over 20,000 sq. ft which is houses a significant 14 MW power station that feed the local grid. So, a significant contributor to the local economy. • It has 13 yards ranging from 1250 sq. ft to 5400 sq.ft. We are full to the brim. We continually must turn away enquiries for warehousing and offices. Aside from G&K Groundworks Ltd and its 28 tenants it appears from conversation with		

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																	other business on the MTE they have not been engaged with. Yet this draft document along with the many website uploads. All indicate that our opinions are reflected in this draft plan. That is not true! Questions over consistency with CPBC Regeneration policies		
0277-0001	Individual	Caroline	Gunn		Yes	Whole Plan	Yes	Dear Sir/Madam, I support the Castle Point Plan Regulation 19 Draft Consultation. I consider the draft plan to be legally compliant. I consider the draft plan to be sound.	Yes				Not Stated		No		Castle Point Plan is sound and legally compliant,	Support Noted	N

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0330-0001	Organisation	Michael	Murrell	Basildon Council		SP3	No	1.1 Basildon Borough Council is a neighbouring local planning authority (LPA) to Castle Point and there are a number of strategic issues, such as housing and infrastructure, which have cross-boundary impacts over a number of local authority areas. It is important that such issues are addressed through collaborative working and meaningful discussions in accordance with the Duty to Cooperate, the National Planning Policy Framework (NPPF), and National Planning Practice Guidance (NPPG). 1.2 It is understood that the main purpose of the consultation document is to ensure that Castle Point's Local Plan is legally compliant and meets the tests of soundness. Please be advised that for all of the consultation points below, the Council would like to attend the future oral hearings as part of the Plan's Examination in Public. Q. Do you consider the Castle Point Plan Draft document to be legally compliant? 1.3 Basildon Borough Council does not believe that the Castle Point Local Plan 2026-2043 is compliant with necessary legislation. The National	No	Positively Prepared, Justified, Consistent with National Policy, Effective	1.5 Basildon Borough Council does not believe that the Castle Point Local Plan 2026-2043 meets the tests of soundness in all of its policy areas. Positively Prepared 1.6 Castle Point Draft Local Plan does not make adequate housing provision using the Standard Method and therefore is a failure to meet the housing need of the area. The housing provision set out in Policy SP3 delivering a minimum of 6,196 new homes over the plan period (2026-2043) accounts to 53% of the requirement set out by the Standard method, which accounts for an unmet need of 5,466 homes. 1.7 Following the publication of the new NPPF (December 2024) Basildon Council is also required to accommodate an increased level of growth and are unable to accommodate any unmet housing need from neighbouring or nearby local authorities, including Castle Point Council. Policy SP3 identifies a stepped housing trajectory, delivering at least 1,045 new homes in years 1 to 5, at least 1,268 new homes in years 6 to 10 and at least 3,883 new homes in years 11 to 17. The plan proposes a place-based approach to					B - confirm for mal response	Considers the local plan is not compliant or sound as the housing strategy does not meet the standard method housing need and considers that the LDS may need to be updated to provide more time for CPBC to gather more evidence. Queries the approach of urban renewal and regeneration with focus on protecting and enhancing the natural environment based on evidence including LNRS Considers that the local plan could have used some Green Belt sites for development which were highlighted in the DAC study July 2025. Does not support policy as does not meet castle point's housing need under standard methodology. Recognises that Policy SP3 exceeds the local need for based on CP's Local Housing Needs Assessment 2023 . Recognises	CPBC has considered what housing delivery can be realistically achieved within its boundaries taking into account its significant environmental and infrastructure restraints as well as its market capacity. This has been rigorously evidenced through the Green Belt Assessment July 2025 which reviewed all potential sites within Castle Point's Green Belt, these sites were then considered against further criteria including: environmental and heritage designations, flood risk, highways issues which impact viability, sustainability as well as having regard for the Essex LNRS and	N

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								Planning Policy Framework expects strategic policy-making authorities to follow the standard method for assessing local housing need. The standard method identifies a minimum annual housing need figure and ensures that plan-making is informed by an unconstrained assessment of the number of homes needed in an area (PPG Paragraph: 002 Reference ID: 2a-002-20241212). Whilst Basildon Borough Council fully appreciates the scale of the challenge and complexity of planning for housing, the alternative approach to calculating housing need is not compliant with relevant legislation. 1.4 The revised Local Development Scheme (LDS, July 2025) identifies two months from publication of Regulation 19 to submission. The Council may need to revise the timetable to allow consultants to finalise outstanding commissioned assessments and for review of consultation responses, which may require additional work to be carried out.			development with policy and site allocations for each of the settlement areas. The Housing Capacity Topic Paper (2025) identifies that Castle Point has capacity for 6,196 homes over the plan period, in line with Policy SP3 in the Plan. Justified 1.12 The urban renewal and regeneration approach with a focus on protecting and enhancing the natural environment has regard to national policies and regional strategies such as the Essex Local Nature Recovery Strategy (LNRS) justified through an extensive evidence base. However, Basildon Borough Council questions whether the approach was the most appropriate considering the failure to meet the standard method. 1.13 The Green Belt Assessment (July 2025) produced by DAC Planning concludes significant recommendations which the Plan has not taken into consideration. The assessment suggests that the Council could alter the Green Belt boundary in 16 locations, there are 12 sub-areas that are recommended for further consideration for plan-making and 19 out of 31 sub-areas assessed as constitute potential Grey						the constraints particular to Castle Point, but plan fails to identify reasonable alternatives to address the unmet housing need. Basildon states it is unable to meet any of Castle Point's Un-met housing need. Queries why grey belt sites identified by the Green Belt Assessment July 2025 were not taken forward in order to meet the Standard Method Housing Need.	strategic opportunity areas for biodiversity improvements. Castle Point's approach to the site review is outlined within The Housing Capacity Topic Paper August 2025. Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence	

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											Belt land. Policy GB2 states that the redevelopment of previously developed land in the Green Belt will not constitute inappropriate development when the site is in an area identified as Grey Belt. The Plan could have made provision for housing in the green belt areas as identified by DAC Planning and 34 Green Belt sites assessed in the Strategic Land Availability Assessment (SLAA 2025) in order to meet the standard method figure for housing supply. Consistent with National Policy 1.14 Castle Point’s Local Housing Needs Assessment 2023 identifies the Council’s objectively assessed housing need to be 255 dwellings per annum or 5,100 dwellings over 2023-2043. Overall, the Plan seeks to provide for a minimum of 6,196 homes over the plan period at an annual average of 354 new homes per annum. Whilst Policy SP3 provides for the local need for housing as per the evidence base assessment, the plan deviates from the national Standard Method. The current Standard Method (November 2024 NPPF) for Castle Point is 686 new dwellings per annum, equating to 11,662 over the							that this is a realistic housing delivery This has been rigorously evidenced through the Green Belt Assessment July 2025 which reviewed all potential sites within Castle Point’s Green Belt, these sites were then considered against further criteria including environmental and heritage designations, flood risk, highways issues which impact viability, sustainability as well as having regard for the Essex LNRS and strategic opportunity areas for biodiversity improvements. Castle Point’s approach to the site review is outlined in The Housing Capacity Topic Paper August	

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											Plan period. 1.15 Paragraph 6.58 states the exceptional circumstances as justification for failure to meet the Government housing targets as set out by the revised Standard Method. Whilst, Basildon Council understands the constraints particular to Castle Point, the plan is not consistent with national policy and fails to identify reasonable alternatives to address the unmet housing need.							2025. Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Any potential grey belt sites identified within the Green Belt Assessment July 2025, were reviewed. However, none were considered suitable for	

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																		development as outlined in the Housing Capacity Topic Paper August 2025. Within the NPPF Paragraph 11 section b (i) and (ii) give an acknowledgement of circumstances in which national policy does not expect Standard Method outcomes to be met in full. This includes situations where: - the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area 7 ; - any adverse impacts of doing so would significantly and demonstrably	

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																		outweigh the benefits, when assessed against the policies in this Framework taken as a whole. Footnote 7 clarifies this position by providing a list of constraints. Green Belt is, prominently, among these, as is flooding. Paragraph: 002 Reference ID: 3-002-20190722 of the PPG advises that “Plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations...” The NPPF footnotes set out the areas where the Framework would provide strong reasons for restricting the overall scale, type or distribution of development in	

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																		the plan area (such as the Green Belt and other protected areas)."	
0279-0001	Individual	Jane	Dexter		Not Stated	SP3	Yes	Dear Cllr Dave Blackwell, I am a resident of Castle Point and fully support the Plan's proposal to preserve our Green belt. I agree that new homes should be built on brownfield site's within the borough and the relevant infrastructure improvements should be made to support the increase in traffic/population. Kind regards,	Yes				Not Stated		No	A	Fully support the Plan's proposal to preserve our Green belt. I agree that new homes should be built on brownfield site's within the borough and the relevant infrastructure improvements should be made to	Support noted.	N

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								Jane Dexter Sent from my iPhone									support the increase in traffic/ population.		
0330-0002	Organisation	Michael	Murrel	Basildon Council		For word	Not Stated	1.11 Basildon Borough Council believes that it has a proactive working relationship with Castle Point Council demonstrated by the ongoing regular programme of Duty to Cooperate meetings, where any emerging cross boundary issues are fully discussed and addressed by both councils.	Not Stated							B - confirm formal response	There are no DtC issues	Noted	N
0281-0001	Individual	DP	Mahoney		Not Stated	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local	Grey belt covered under policy GB2. SLAA and Sa considered all reasonable site options. Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue

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											Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Having lived on the Island since 1969, I have always enjoyed Island life. Indeed I felt this was a wonderful, safe place for my Children to grow up, enjoying similar places that I did as a child. The Splash park has fallen into disrepair and we were unable to use it. The Seafront was very rundown and is now crammed on my occasions, so much so, that I haven't visited the Seafront or Sea walkways for over 10 years now, despite it being one road away. The Island is very unkempt at times, our bins being collected fortnightly (pink one week, black the next) our Police Station is part time (no front desk, walk in available). A family member was involved in a car accident, it took too long for an ambulance and police to attend, which put that person's life in danger. Our Ambulance station in Sydervelt was closed a long time ago. We should always have an ambulance based at the Charfleets Ambulance Service Facility. We have no A&E, often						plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered, no Greenbelt / Grey Belt sites added, with the exclusion of North West Thundersley. Canvey: Concerns over flood risk. SUDS must be designed with a full understanding of Canvey's unique drainage context. Concerned about lack of ambulance station or A&E on Canvey and traffic gridlock. The shops are			SP3 option 4) outlines why North West Thundersley was not preferred. Flooding: Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Needs of emergency services considered in the supporting	infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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											having to travel to Orsett, Basildon or Southend, which is concerning and could be alleviated by having a Triage based at the Paddocks Medical Centre. Many people would not then require the travel over to the other places. Traffic is now reaching gridlock. It takes people ages to leave and return for and after a full working day. People now spill out from Benfleet station while waiting for Bus services, many buses standing room only. If you wish to visit Lakeside, or have a hospital appointment, it takes ages to even leave Canvey Way to join any major road, a funeral can cause major delays (and this isn't fair on the Mourners themselves either). I'm at a loss to understand why people wish to cram and cram too many people onto a cul-de-sac Island, removing the only area with large working facilities (Charfleets). Forcing many long running and several Generations owned business' out of work and facing closure. The shops are limited, the entertainment is limited, services and companies limited, schools, dentists and GP surgeries bursting and unable to cope. It's not unusual to find a 6/8 week wait to see anyone urgently						limited, the entertainment is limited, services and companies limited, schools, dentists and GP surgeries bursting and unable to cope. There should be no further building. Canvey Island is beyond full. Canvey Way needs to be a dual carriageway urgently for safety reasons (should there be a need to evacuate, that's 4 lanes to go off the Island). I have Children and Grandchildren who cannot afford or indeed find properties available to be near me as I grow older. I myself had this issue 30 years ago, having to buy my first home off the Island, but return daily	Infrastructure Delivery Plan (IDP). Infrastructure matters (including health related)are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Highways Impacts: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions.	

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											for care and health worries. It's now a misery already to reside here, it's so cramped. Please use common sense and find other areas around the District to place new homes. Please stop putting lives at risk, in the event of a Gas problem at the Oikos Centre, Floods or indeed just as worrying, from Planes that fly directly over the Island at a growing rate, due to the concerns over the dangerous ship in the Thames Estuary at Shoebury. There should be no further building. Canvey Island is beyond full. Canvey Way needs to be a dual carriageway urgently for safety reasons (should there be a need to evacuate, that's 4 lanes to go off the Island). I have Children and Grandchildren who cannot afford or indeed find properties available to be near me as I grow older. I myself had this issue 30 years ago, having to buy my first home off the Island, but return daily several times before and after work to care for my own Elderly Parents, before being able to return to the Island and buy a home able to cope with three generations, which I have owned for over 24 years. The Council homes system is also broken, many people from						several times before and after work to care for my own Elderly Parents, before being able to return to the Island and buy a home able to cope with three generations, which I have owned for over 24 years. The Council homes system is also broken, many people from all over Kent, London and beyond are being permitted to take over the properties on the Island, with no connection to it. While people with Disabilities, DV situations and Bereaved who have local family networks that would help and support them, are forced away from the Island to Southend or Basildon and		

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											all over Kent, London and beyond are being permitted to take over the properties on the Island, with no connection to it. While people with Disabilities, DV situations and Bereaved who have local family networks that would help and support them, are forced away from the Island to Southend or Basildon and beyond. This is ridiculous too. You are crushing the very essence of this Island, the Sealife surrounding it and it often Floods internally because the roads and structures cannot cope with anything as it is, without adding many more homes and families to it. Already changing the Thorney Bay camp into a home area, causes additional traffic and dangerous junctions, on a School route. The Island is filled to capacity, bursting at the seams and the quality of life and health is reducing monthly.						beyond. This is ridiculous too. You are crushing the very essence of this Island, the Sealife surrounding it and it often Floods internally because the roads and structures cannot cope with anything as it is, without adding many more homes and families to it. Already changing the Thorney Bay camp into a home area, causes additional traffic and dangerous junctions, on a School route. The Island is filled to capacity, bursting at the seams and the quality of life and health is reducing monthly.		

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0281-0002	Individual	DP	Mahoney		Not Stated	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0330-0003	Organisation	Michael	Murrel	Basildon Council		E1	No	1.8 Policy E1 and E2 sets out how the Council will meet their employment needs as identified in the Economic Land Demand forecast produced by Experian (2024) for a net demand of 4,000m2 additional office floor space, which can be met by current oversupply of potential 9.5 ha based against extant permissions.	No	Positively Prepared, Justified, Consistent with National Policy, Effective	1.10 Whilst the Infrastructure Delivery Plan (IDP 2025) produced by DAC Planning concludes that there are no significant issues or concern identified which could have an impact on the strategy of the emerging Castle Point Plan, the methodology was based on three growth scenarios previously identified in the Regulation 18 draft plan. It is understood that an addendum will be carried out to provide an update to the document, Basildon Council considers it essential that Castle Point update the IDP accordingly to take full account of the urban renewal and regeneration approach proposed in the Regulation 19 Plan. Therefore, it is vital that the IDP is updated to ensure that sufficient provision for the delivery of new infrastructure is made to support the proposed level of growth.					B - confirm for formal response	Notes that CP can meet its employment needs and there is an oversupply	Noted	N

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0330-0004	Organisation	Michael	Murrell	Basildon Council		Whole Plan	No	The revised Local Development Scheme (LDS, July 2025) identifies two months from publication of Regulation 19 to submission. The Council may need to revise the timetable to allow consultants to finalise outstanding commissioned assessments and for review of consultation responses, which may require additional work to be carried out. Basildon Borough Council does not believe that the Castle Point Local Plan 2026-2043 meets the tests of soundness in all of its policy areas.								B - confirm for formal response	BDC considers that the Local Development Scheme may need revising due to required additional work Basildon Borough Council does not believe that the Castle Point Local Plan 2026-2043 meets the tests of soundness in all of its policy areas.	Should it be required the Local Development Scheme will be updated. BBC has only provided comments with regards soundness for policy SP3. It is unclear on what basis BBC considers all other policy areas to be unsound.	N
0330-0005	Organisation	Michael	Murrell	Basildon Council		IDP	No	Whilst the Infrastructure Delivery Plan (IDP 2025) produced by DAC Planning concludes that there are no significant issues or concern identified which could have an impact on the strategy of the emerging Castle Point Plan, the methodology was based on three growth scenarios previously identified in the Regulation 18 draft plan. It is understood that an addendum will be carried out to provide an update to the document, Basildon Council considers it essential that Castle Point update the IDP accordingly to take full account of the urban renewal and	Not Stated	Not stated						B - confirm for formal response	Considers that the IDP needs to be updated to include the amended housing strategy in the Reg 19 plan which included the additional growth proposals at Canvey Island	Additional work has been undertaken to the IDP to reflect the additional growth proposals at Canvey Island.	N

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								regeneration approach proposed in the Regulation 19 Plan. Therefore, it is vital that the IDP is updated to ensure that sufficient provision for the delivery of new infrastructure is made to support the proposed level of growth.											
0765-0001	Individual	jaqueline	haste	betafit kitchens	Yes	SP3	No	FAILED TO CONSIDER STRATEGIC ALTERNATIVES LIKE NORTH WEST THUNDERSLEY. NO CREDIBLE 5 YEAR HOUSING SUPPLY	No	Justified, Consistent with national policy	The draft local plan is not justified with national policy. Doesn't meet the housing target for castle point. Site selections ignore Greenbelt/Grey belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt built policy" Site selection is based on the overdevelopment of Brownfield sites. Not all sites considered, No Greenbelt/grey belt sites added and with the exclusion of North west Thundersley. NPPF guidelines state development should be directed away from area's at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3316 Urban homes for Canvey is not resident led. Canvey West homes puts residents in the East of Canvey at risk with emergency evacuation procedures.	ADD North west Thundersley site. 187Ha A greenbelt Grey belt Brownfield site option for 7500 homes Reduce the urban housing target to 3500 from 6200 with Canvey at 1050 Total housing target of 11000 homes	No	Not Answered	Not Answered	A	Lack of Five Year Housing Land Supply Green/Grey Belt not considered North West Thundersley Flood Risk on Canvey Emergency Evacuation Concerns	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore	N

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																		important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing	

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																		land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural	

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																		environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. North West Thundersley North West Thundersley is in the Green Belt. For those	

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																		reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to	

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																		restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/	

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0284-0001	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	For word	Yes	BBC has no specific concerns to raise over CPBC's legal compliance with respect to the Duty to Co-operate. BBC is satisfied with the significant amount of cross-boundary engagement that CPBC has undertaken, including as part of the Association of South Essex Local Authorities (ASELA) and Essex Planning Officers Association (EPOA). The Council would, however, like to emphasise the importance of ongoing and meaningful collaboration between the local authorities in helping to address aspects across all identified strategic priorities, particularly in the context of infrastructure. As such, CPBC are encouraged to continue to positively and constructively engage with BBC on strategic cross-boundary issues, particularly as the Brentwood Local Plan Review progresses. Considering Paragraph 28 of the NPPF, BBC requests the agreement of a Statement of Common Ground with CPBC to evidence areas of agreement in support of the submission of the Plan for examination. BBC also wishes to make clear that it is not in a position to	Not Stated				Not Stated		No	A	No concerns to raise over CPBC's legal compliance with respect to the Duty to Co-operate. States that continued collaboration is important Brentwood is unable to assist with CPBC's unmet housing need Requests a Statement of Common Ground to evidence areas of agreement.	CPBC will still collaborate with BBC through SEC and EPOA to address cross boundary strategic issues. Noted that BBC is unable to assist CPBC in meeting its unmet housing need. CPBC will prepare a statement of common ground.	N

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								accommodate any unmet housing need arising from Castle Point, and no agreement currently exists to do so.											
0284-0002	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	SP3	No	Policy SP3: As above, BBC is not supportive of the CPLP housing strategy as this does not commit to meeting the Borough's identified standard method housing need requirement in full within the CPBC administrative boundary. Limited information is provided regarding the justification for the dismissal of alternative spatial strategy options that might have enabled CPBC to meet its full housing need and, no approach is outlined for addressing the unmet need. As such, BBC finds Policy SP3 to not be legally complaint or sound. BBC however has no specific concerns to raise over the soundness of the sites proposed for allocation in this strategy.	No				Not Stated		No	A	Considers the local plan is not legally compliant or sound as housing strategy does not meet all of the housing need calculated by the standard methodology Acknowledges CP's physical and environmental constraints. Considers that there is limited technical evidence to justify lower housing delivery and no full transparent assessment of alternative spatial strategies including one that would meet the full standard methodology housing need. Suggest that further evidence and testing required – propose the cumulative impact on transport	CPBC has considered what housing delivery can be realistically achieved within its boundaries taking into account its significant environmental and infrastructure restraints as well as its market capacity. This has been rigorously evidenced through the Green Belt Assessment July 2025 which reviewed all potential sites within Castle Point's Green Belt, these sites were then considered against further criteria including: environmental and heritage	N

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																		designations, flood risk, highways issues which impact viability, sustainability as well as having regard for the Essex LNRS and strategic opportunity areas for biodiversity improvements. Castle Point's approach to the site review is outlined within The Housing Capacity Topic Paper August 2025. Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises	

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																		that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery. CPBC notes that Brentwood is unlikely to be able to assist CPBC in meeting its unmet housing need. CPBC has followed the EPOA protocol for considering unmet housing need and has requested assistance from all its neighbouring authorities. No authority was able to assist. CPBC transport assessment provided high level modelling of the impact of growth on key highway junctions. Further transport	

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																		assessments will be carried out as housing allocations come forward during the local plan period. BBC and the other South Essex Local Authorities are currently preparing their local plans and developing their housing strategies to accommodate the expected significant growth across South Essex. As these local plans come forward, their transport assessments will add to the evidence and provide greater granular detail of the impact of this cumulative growth on the transport network. CPBC welcomes collaboration with neighbouring authorities on their transport assessments as	

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																		they finalise their housing strategies following the revised December NPPF 2024. CPBC also proactively engages with ECC LTP4 work which provides evidence for transport infrastructure for all of Essex	
0284-0003	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	D3	Yes	BBC supports CPBC's approach to require the use of Master Plans for allocated sites as these can be a valuable tool to ensure development proposals. achieve the intentions of the relevant policies in the Local Plan. Additionally, the Council supports the inclusion of the requirement for Master Plans to be 'approved by the Council' in advance of planning application determination.	Yes						No	A	Supports policy of requiring master plans to be in place for allocated sites	Noted	N
0284-	Organisation	Emma	Goodings	Brentwood Boro	Not Stated	D9	Yes	BBC supports CPBC's approach for protecting and enhancing heritage assets	Yes						No	A	Supports policy of protecting and enhancing heritage	Noted	N

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0004				ugh Council				in the borough and has no specific concerns over the soundness of this policy.											
0284-0005	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	Hou6	Yes	The Council supports CPBC's approach to meeting identified needs for additional Gypsy and Traveller accommodation. BBC would like to emphasise the need for continued close and effective working on Gypsy and Traveller accommodation across Essex, through the EPOA and other strategic planning groups. Furthermore, it is important for CPBC to continue to engage with the ongoing EPOA programme of work to identify the need for a transit site within Essex, with any outcomes of this work factored into reviews of the CPLP.	Yes						No	A	Supports policy for Gypsy and Traveller Accommodation	CPBC agrees to work with South Essex Authorities on Gypsy and Traveler accommodation and with EPOA to identify a transit site within Essex	N
0284-0006	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	E1	Yes	BBC is broadly supportive of these policies and the CPLP's overall economic strategy. It is acknowledged that the provision of new employment land in and around town centres, and the safeguarding of economy use at existing sites may provide opportunities to broaden and diversify the local economy and provide employment opportunities for residents of a wider area both directly and indirectly through supplementing wider supply chains.	Yes						No	A	Supports economic policy for strategic development of employment land	Noted	N

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0284-0007	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	E2	Yes	BBC is broadly supportive of these policies and the CPLP's overall economic strategy. It is acknowledged that the provision of new employment land in and around town centres, and the safeguarding of economy use at existing sites may provide opportunities to broaden and diversity the local economy and provide employment opportunities for residents of a wider area both directly and indirectly through supplementing wider supply chains.	Yes						No	A	Supports policy for new floorspace in town centres	Noted	N
0284-0008	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	TC1	Yes	BBC has no specific concerns over the soundness of these policies.	Yes						No	A	Has no concerns over the soundness of Town Centre and Retail policy	Noted	N
0284-0009	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	TC5	Yes	BBC has no specific concerns over the soundness of these policies.	Yes						No	A	No concerns over the soundness of Hot Food Takeaway policy	Noted	N
0284-0010	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	ENV 1	Yes	BBC has no specific concerns over the soundness of this policy, or the wider environmental strategy	Yes						No	A	No concerns over the soundness of protecting and enhancing the landscape policy	Noted	N
0284-0011	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	SP4	Yes	BBC has no specific concerns over the soundness of this policy, or the wider infrastructure delivery strategy. BBC would, however, like to emphasise the importance	Yes						No	A	No concerns over soundness of Developer Contributions policy	CPBC will continue to positively engage with the South Essex Councils through SEC and	N

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								of ensuring that the impacts of growth on key cross-boundary infrastructure including, schools, open spaces and healthcare services. This will require continued commitments to collaborative working, including through positive engagement between the Councils as a part of ASELA and the EPOA.										EPOA to ensure that the necessary infrastructure requirements are in place to support growth	
0284-0012	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	T1	Yes	BBC is broadly supportive of these policies and the wider transport strategy proposed. BBC however, would like to highlight the need to keep under consideration the impacts of growth on shared infrastructure, such as on the A127. It is critical that the impacts of growth on the highway network are carefully considered and mitigated. In particular, BBC considers the adequate mitigation of the impacts of growth on the A127 and A129 to be paramount to achieving sustainable development in South Essex. The Council would welcome continued future cross-boundary engagement regarding shared highways and transportation matters and request that information regarding proposed infrastructure improvement plans are shared with officers prior to works being agreed.	Yes						No	A	Broadly supports CPBC Transport Strategy but adequate mitigation needs to be in place A127 and A129 to support growth.	CBPC recognises that congestion on A127 is an issue for growth in the region and will positively engage with BBC and other Essex authorities to ensure that impact of its growth and the growth from other authorities on transport network is carefully considered including A127 and A129	N

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0284-0013	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	T2	Yes	BBC is broadly supportive of these policies and the wider transport strategy proposed. BBC however, would like to highlight the need to keep under consideration the impacts of growth on shared infrastructure, such as on the A127. It is critical that the impacts of growth on the highway network are carefully considered and mitigated. In particular, BBC considers the adequate mitigation of the impacts of growth on the A127 and A129 to be paramount to achieving sustainable development in South Essex. The Council would welcome continued future cross-boundary engagement regarding shared highways and transportation matters and request that information regarding proposed infrastructure improvement plans are shared with officers prior to works being agreed.	Yes						No	A	Broadly supports the policies on highway improvements but adequate mitigation needs to be in place A127 and A129 to support growth. Encouraged cross boundary collaboration to consider growth and transport in the area.	CPBC recognises that congestion on A127 is an issue for growth in the region and will positively engage with BBC and other Essex authorities to ensure that impact of its growth and the growth from other authorities on transport network is carefully considered including A127 and A129	N
0284-0014	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	T3	Yes	BBC is broadly supportive of these policies and the wider commitment to enhance active travel and public transport infrastructure. BBC would, however, like to emphasise the importance of ensuring the impacts of growth on sustainable transport networks are carefully considered and mitigated	Yes						No	A	Broadly supports enhanced active travel and public transport but most ensure that impacts of growth on sustainable transport networks are considered and mitigated if necessary.	CBPC recognises the need to carefully consider the impact of growth on sustainable transport networks and will positively engage with South Essex Authorities to	N

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																		Avoid, Minimise or Mitigate any impacts.	
0284-0015	Organisation	Emma	Goodings	Brentwood Borough Council	Not Stated	T4	Yes	BBC is broadly supportive of these policies and the wider commitment to enhance active travel and public transport infrastructure. BBC would, however, like to emphasise the importance of ensuring the impacts of growth on sustainable transport networks are carefully considered and mitigated	Yes						No	A	Broadly supports enhanced active travel and public transport but most ensure that impacts of growth on sustainable transport networks are considered and mitigated if necessary.	CBPC recognises the need to carefully consider the impact of growth on sustainable transport networks and will positively engage with South Essex Authorities to Avoid, Minimise or Mitigate any impacts.	N
0360-0001	Organisation	Marlene	Curtis	British Horse Society		C3					First the BHS acknowledges that Policy C3 - Canvey Port Facilities (d) includes equestrians when public access is sought and enhanced along the coastal path and where Item 8.30 pg. 39 repeats the opportunities.				See attachment	B	Support for Policy C3 criteria d and paragraph 8.30.	Support noted.	N
0360-0002	Organisation	Marlene	Curtis	British Horse Society		Para 12.2					acknowledges the area's long history of equine activity and the potential of extending wildlife habitat and recreational access to improve connectivity to various nearby woodland sites				See attachment	B	Support for reference to equine activity and potential of extending wildlife habitat and recreational access to improve connectivity to various nearby woodland sites	Support noted.	N
0360-0003	Organisation	Marlene	Curtis	British Horse Society		T3					Policy T3 - Active Travel Improvements No. 5, pg. 162, confirms horse riders are included in the creation of routes to provide				See attachment	B	Support Policy T3 criteria 5 and paragraph 20.39	Support noted.	N

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				Society							recreational opportunities, as justified at Item 20.39 pg. 163.								
036 0-000 4	Organisation	Marlene	Curtis	British Horse Society		Para 20.38					regarding the Thames Estuary Path and provision of a footpath and cycleway network connecting Tilbury to Leigh-on-Sea, we request inclusion and emphasise that horse riders also wish to travel further afield (at times enjoying B & Bs with their horse) in the same way as Peter de Savary's past refused intention of bridleway access to Coal House Fort, and today also to reach the likely off-road access connected to the new Thames Crossing.				See attachment	B	Thames Estuary Path Project should include access to horse riders as well as walking and cycling.	Through work with the Council's partners on projects such as the Thames Estuary Path Project, the Council will encourage new or improvements to routes to be accessible for all active travel modes.	N
036 0-000 5	Organisation	Marlene	Curtis	British Horse Society		T3					Today's extreme levels of traffic, besides causing deaths and injuries to riders and horses, in 2024 had a 33% rise in equestrians being the victims of road rage - a 43% increase over the previous year. The enclosed BHS News "Statistics shock" also records 81 % of incidents are caused by drivers passing too closely or too quickly. The 2022 massive rise in road incidents to 3,552 also needs remembering when horse riders have no alternative but to use roads and navigate amongst traffic to reach an off-road bridleway. On safety grounds, the BHS has already advised Castle Point of the need for an off-				See attachment	B	Extreme level of traffic causing death and injuries to riders and horses. Instances in the Plan where equestrians have been excluded from proposed new walking and cycling access. Equestrian needs ignored in past Local Plans. Petition from Canvey Island Horse Riders previously, asked to urge ECC and Castle Point Borough Council to review bridleway provision in the Borough to ensure	Noted. Policy T3 seeks to support active travel routes, including those for recreation for walkers, cyclists and horse riders. Essex County Council as the Highways and Transportation Authority are responsible for the management of Public Rights of Way, including Bridleways.	N

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											road BR network, in which both walkers and cyclists are legally included, but nothing has resulted. In instances in the Plan where equestrians have been excluded from proposed new walking and cycling access, we consider the Local Plan unsound and that equestrian access together with designated A 13 and A 127 road crossings are basic options that need inclusion. Until 1993, when riders achieved a few public BRs via DMMOs, Castle Point had 50 miles of public footpaths but nil BR provision. Equestrian needs were ignored in past Local Plans (apart from the 2021 dismissed Plan) to the point of discrimination. Some BR claims failed, such as the Ordnance Survey noted historic Gt. Common "Cart Track" route now banned despite ridden in the past to reach Kingsley Lane, now BR82x. In 1900 the cart track was strategically placed for all cart men from Rayleigh and surrounds to drive their horses to and from the forge existing adjacent the White Hart pub. Additionally, compared to walkers and cyclists, equestrian needs hardly featured within the 2012 Olympic local legacy; nor was any known						bridleways are maintained and new and safe bridleways provided. In absence of comprehensive intention to address rider’s need, is the Plan legally compliant?		

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											improvement made resulting from the Rights of Way Improvement Plan (ROWIP) required from every local authority under the 2000 CROW Act. The enclosed 2010 Hansard copy of a debate on the petition presented by Canvey Island horse riders also included riding routes being barred by the Council, of a desperate need for safe places to ride and of further bridleways being needed across the whole Borough. The Government was asked to urge ECC and Castle Point Borough Council to review bridleway provision in the Borough, to ensure traditional bridleways were maintained and that new and safe bridleways were provided. The observations of the Secretary of State for Environment, Food and Rural Affairs included that the Government were committed to improving the off-road riding network and that DEFRA, too, were aware of this with needed changes detailed; the 2000 CROW Act and ROWIPs were referred as being the prime means by which local highway authorities could identify the needed changes and improvements but, as noted above, no known improvement for horse riders resulted.								

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											We wonder here in the absence of a comprehensive intention to address riders' needs, whether the Plan is legally compliant? On the mainland, paths that were also barred and locked included the "Public Open Space" link used by walkers and horse riders that existed between Central Ave. and Poors Lane, as well as horse riders barred from riding through the Belfairs Nature Reserve after nearly 40 years of known use.								
0360-0006	Organisation	Marlene	Curtis	British Horse Society		SP1					The Belfairs Nature Reserve The writer enjoyed riding through the Nature Reserve from mid 1940s to mid 1970s via the open link with the Belfairs Trotting Track, via Warren Road and via The Woods access adjacent to Greenacres Farm, where the writer's pony was kept prior the farm's sale for housing development. No notices banning riding existed and the warden once informed which track to ride to see fox cubs playing. Also enclosed are copies of two letters received, one dated 1982 from Valerie Perkins who describes her use, and of others, being in full sight of the warden; that wildlife is never frightened by horses but are disturbed by dogs; that she wished to see				See attachment	B	Previous enjoyment of riding through the Nature Reserve from mid 1940s to 1970s. See attached submissions supporting this. Difficult to understand why Reserve is fully within the boundary of Castle Point Borough but is managed by Southend Council who have banned access to horse riders and cyclists. Southend Council byelaws – must be reasonable, consulted upon (BHS were not consulted) and consistent with	The Belfairs Nature Reserve is located outside the administrative area of Castle Point. This is located within the administrative area of Southend-on-Sea City Council.	N

ID Ref	Individual/Organisation/Age nt?	Firs t Na me	Last Na me	If orga nisat ion - nam e	Has agree d to publi catio n of Name /Com ment s?	Poli cy/ Par a No.	2a. Leg ally Co mp lia nt?	2b. If No, explanation	3a. So und?	3b. Positive/Eff ective/Justif ied/Consist ent?	3c. Explanation	4. Suggested modifications	5. Wi sh to par ti ci pat e in ex am	6. Wh y?	Sup porti ng Evid enc e sup plie d?	Opt ion A, B or C	Summary	Officer Response	Mods Require d	
											again safe places open to riders to prevent the necessity of using highways and that she couldn't understand why the less used tracks should not be available to riders again. She also states that horse droppings are beneficial in the ecological cycle (we add that bugs and especially the Dung Beetle consider droppings a "Sunday lunch"). The second copy letter from D. Smith to ECC confirms that on school trips to the Reserve for nature studies during 195 8 - 1963 she saw horse riders using the Reserve's various paths on many occasions. In Oliver Rackham's ancient woodland book "The Woods of South-East Essex" the numerous double pecked tracks through the Reserve are recorded as "Road or woodland ride". The enclosed 1996 photo informs of a "Ride" closed for woodland work where tracks of vehicles are also very evident. (Encs. 2 copy letters and photo.) We also find it difficult to understand when the Reserve is fully within the boundary of Castle Point Borough that it is managed by Southend Council who have banned access to horse riders and cyclists. Especially when the book							general law. Home Office Model Byelaws to consider which state byelaws should not discriminate unfairly against one section of the community and justification is needed if byelaws are imposed on acreages above 10 acres - which certainly applies to the 92 acres of the Nature Reserve. The Reserve has numerous rides - the longest encircling the boundary passing 6 access points within which another 5 rides traverse in all directions. Riding ban conflicts with Forestry England March 2025 Access Review states horse riders will be able to enjoy hacking in 49 more woodlands across England without riders needing a permit. Request local riders to be able to enjoy reinstatement of		

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											"Leigh-on-Sea - A history" by Judith Williams on Pg. 102 informs "In 1938 Southend purchased over 40 acres of Belfairs Great Wood in conjunction with Ben fleet Urban District Council and Essex County Council with the aim to create an area of Nature Reserve and for this purpose £1,000 was raised by voluntary subscription". A further 52 acres were added in 1947 and known use by horse riders was from 1939 until late 1970s when the booklet "The Wildlife and History of Belfairs Nature Reserve" states they got blamed for "churning up and destroying ground flora and are also an inconvenience to walkers". While we consider the latter reason to be invalid, the former reason is totally incompatible with the continuous motorised use of Rides to carry out rotational coppicing. The booklet also records the 1986 laying of a new sewer involving a 40' wide swathe of churned-up subsoil and replaced top soil that, within two years, resulted in 38 new colonisers along the sewer line, 28 of which previously had been unrecorded. Southend Council byelaws: We understand byelaws banning both riders and							riding access in the Nature Reserve within a very short time.		

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											cyclists from the Reserve were introduced "by declaration on 22.10.81." and confirmed by the Department of the Environment in October 1993. However, in law byelaws must be reasonable, consulted (the BHS was not consulted) and consistent with general law and not imposed just because a mischief is feared. There are also the Home Office Model Byelaws to consider which state byelaws should not discriminate unfairly against one section of the community and justification is needed if byelaws are imposed on acreages above 10 acres - which certainly applies to the 92 acres of the Nature Reserve. The Reserve has numerous rides - the longest encircling the boundary passing 6 access points within which another 5 rides traverse in all directions. Further, the riding ban conflicts with Forestry England (the nation's largest land manager caring for 1500 woods and forests across England) when their March 2025 Access Review states horse riders will be able to enjoy hacking in 49 more woodlands across England without riders needing a permit, while still protecting sensitive								

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											habitats, maintaining safe access for all and giving greater freedom for riders to explore our countryside. Forestry England's Chief Executive said the decision reflected their commitment for the nation's forests to be as welcoming and available as possible, including for the equestrian community. We request that local riders will similarly be able to enjoy the reinstatement of riding access in the Nature Reserve within a very short time.								
0360-0007	Organisation	Marlene	Curtis	British Horse Society		Para 12.2					Regarding the Plan's stated long history of equine activity in this area, we remind of the "best value" a public bridleway status has by the inclusion of both walkers and cyclists. Horse riding (90% women - Sport England) is considered both beneficial to health and well-being. Women and girls also feel much safer riding a horse when alone in the countryside and quiet places. Additionally, wildlife accepts a rider atop a horse as another harmless animal and remains undisturbed. The relationship of birds enjoying horses is confirmed by the enclosed photo of five birds perched on a horse's back.				See attachment	B	Public bridleway status includes both walkers and cyclists. Horse riding is considered beneficial to heath and wellbeing. Women and girls feel safer riding a horse alone in the countryside and quiet places. Wildlife accept horse riders as harmless and remain undisturbed. See attachment.	Noted.	N

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0360-0008	Organisation	Marlene	Curtis	British Horse Society		Para 12.3			No		The second point of introducing further cycle routes ... north along ... Daws Heath Road to provide additional access to Belfairs Nature Reserve and West Wood, if West Wood's northern access adjacent the Ragwood Riding School is considered but the existing bridleway use is not included, we consider the Local Plan to be unsound. Regarding access for cyclists to the Nature Reserve, unless our Nature Reserve points above result in the inclusion of horse riders as well, we consider the Local Plan again to be unsound.				See attachment	B	Routes along Daws Heath Road to Belfairs Nature Reserve and West Wood, should consider access to Ragwood Riding School and the existing bridleway. Access to the Nature Reserve should be for horse riders as well as cyclists.	Noted. Policy T3 seeks to support active travel routes, including those for recreation for walkers, cyclists and horse riders. Essex County Council as the Highways and Transportation Authority are responsible for the management of Public Rights of Way, including Bridleways.	N
0360-0009	Organisation	Marlene	Curtis	British Horse Society		DH 1			No		Re No. 4 of "projects improving managed walking and cycling connections across the wider area will be supported", here again if horse riders are omitted from this Green Space Connectivity the Local Plan is considered to be unsound.				See attachment	B	Re No. 4 of "projects improving managed walking and cycling connections across the wider area will be supported", here again if horse riders are omitted from this Green Space Connectivity the Local Plan is considered to be unsound.	A modification to policy DH1 point 4 is agreed to ensure the long history of equine activity in the area is protected.	Y
0360-0010	Organisation	Marlene	Curtis	British Horse Society		Para 12.7					includes an existing 5.5 Mile "Seven Woods Walk" and here we would like to see horse riding use included. Alternatively, local horse riders would very much welcome a				See attachment	B	includes an existing 5.5 Mile "Seven Woods Walk" and here we would like to see horse riding use included. Alternatively, local	Noted. This paragraph is identifying the woodland around Daws Heath.	N

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											similar Ride of this distance being planned within the Borough's Woods.						horse riders would very much welcome a similar Ride of this distance being planned within the Borough's Woods.		
0360-0011	Organisation	Marlene	Curtis	British Horse Society		T3					To help achieve rider's needs we enclose a copy of ECC's 2019 News Release pledging to improve and increase the number of bridleways in Essex, the action to be taken and their consideration for new bridleways in planning developments. A further option for improving access for riders is by fully implementing the historic Railway Map Survey for the Parish of Leigh in which 4 Public Bridleway Roads in the ownership of Surveyors of Highways and ors. are stated to exist but which today's landowner, the Salvation Army, currently does not recognise across their land. Finally, riders of Belfairs Wood Trotting Track and of West Wood bridleway have informed of constantly being chased by off-lead dogs. In a West Wood incident, two dogs chased a horse rider, then entered and continued chasing and pestering another horse in its paddock. We request that Country Code signs are erected on all Bridleways making clear the danger				See attachment	B	Existing public bridleway roads are not recognised. Riders of Belfairs Wood Trotting Track and West Wood Bridleway have informed of constantly being chased by off-lead dogs. County Code signs should be erected on all Bridleways.	Noted. Policy T3 seeks to support active travel routes, including those for recreation for walkers, cyclists and horse riders. Essex County Council as the Highways and Transportation Authority are responsible for the management of Public Rights of Way, including Bridleways.	N

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											loose dogs cause to horses, riders and likely, if kicked, to the dogs themselves.								
0360-0012	Organisation	Marlene	Curtis	British Horse Society		T1	Not Stated	Thank you for your reminders for a response within the consultation extension. For the British Horse Society under option B) I submit the additional details to Point 12 (Achieving Riders' needs) in my initial 25 September 2025 reply. Here, re improving access for riders via the referred historic Railway map of 4 Public Bridleway Roads within the ownership of Surveyors of Highways and ors., I request the date of 1846 and reference No. QRU/m 2/56 lodged at the Essex Record Office (ERO) to be added. I also request the following details of a further 1845 Railway Map at ERO, Reference No. QRUM/2/51 to be added. Here 8 Public Bridlepaths are recorded existing within the Parish of Hadleigh and 10 Bridlepaths within the Parish of Leigh together with 2 Occupation Roads and a Public Highway. In existing circumstances of the acute need for horse riders to be able to ride safely off-road to avoid RT As, the Castle Point Plan is considered unsound if it							Attached several new s clipping s, emails and letters		Thank you for your reminders for a response within the consultation extension. For the British Horse Society under option B) I submit the additional details to Point 12 (Achieving Riders' needs) in my initial 25 September 2025 reply. Here, re improving access for riders via the referred historic Railway map of 4 Public Bridleway Roads within the ownership of Surveyors of Highways and ors., I request the date of 1846 and reference No. QRU/m 2/56 lodged at the Essex Record Office (ERO) to be added. I also request the following details of a further 1845 Railway Map at ERO, Reference No. QRUM/2/51 to be added. Here 8 Public Bridlepaths	Unclear how these comments relate to CPBC Plan Policy T1. All CPBC mapping is ONS based. Essex County Council is the responsible authority and is the responsible Public Rights of Way Authority (including Bridleways) and also the Highways Authority.	N

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								does not include the reinstatement of these BRs. Meanwhile, I confirm our previous response submitted was based on the correct version of the plan and the further copy requested is enclosed with our above extension response in the envelope provided.									are recorded existing within the Parish of Hadleigh and I O Bridlepaths within the Parish of Leigh together with 2 Occupation Roads and a Public Highway. In existing circumstances of the acute need for horse riders to be able to ride safely off-road to avoid RT As, the Castle Point Plan is considered unsound if it does not include the reinstatement of these BRs. Meanwhile, I confirm our previous response submitted was based on the correct version of the plan and the further copy requested is enclosed with our above extension response in the envelope provided.		

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0331-0001	Organisation	Elaine	De Can	Canvey Island Town Council		Whole Plan		Following a meeting of the Town Council on the 17th September 2025, I am writing to advise that upon consultation of the local plan the council RESOLVED 8 votes for with 1 against that the proposed plan is unsound for the following reasons and points in relation to the corresponding policy numbers within the consultation: Members raised the following points in relation to policy number SP3: The plan does not take into consideration the views of residents and the proposal for an additional 3300 homes on Canvey Island will overdevelop an existing heavily urbanised area, which is at maximum capacity. The additional residents that these homes will introduce will impact the overall safety of the island and put additional pressure on an existing inadequate policing provision. Canvey Island has two COMAH sites with no clear emergency plan, and an increase in development creating a larger population will further impede attempts to exit the								A	The Plan is Unsound. Members raised the following points in relation to policy number SP3: • The plan does not take into consideration the views of residents and the proposal for an additional 3300 homes on Canvey Island will overdevelop an existing heavily urbanised area, which is at maximum capacity. • The additional residents that these homes will introduce will impact the overall safety of the island and put additional pressure on an existing inadequate policing provision. • Canvey Island has two COMAH sites with no clear emergency plan, and an increase in development creating a larger population will further impede attempts to exit the island in an emergency with the existing inadequate road infrastructure in place.	Noted Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Protection of wildlife is a key consideraion in the Plan as set out in teh Environment chapter Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP). Policy SD8 covers	Yes - Mods set out in the schedule, including to C1 and ENV3 sections

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								island in an emergency with the existing inadequate road infrastructure in place. Members raised concerns that the addition of such a large number of homes will cause an increase in vehicles, which the current insufficient road infrastructure cannot support. Canvey Island is a flood zone 3a, which is the highest probability of flooding, and is already heavily urbanised with limited green spaces. Any use of remaining green belt land for development will add to the already high flood risk and could impact the overall safety of residents. Members raised the following point in relation to policy number ENV3: • Concerns that proposed development sites may not have taken into consideration the protection of local wildlife. Members raised the following points in relation to policy numbers C1 and C10: • The proposed development of some brownfield sites will limit and reduce much needed parking facilities for local shops and visitors. Members raised the following points in relation											- Members raised concerns that the addition of such a large number of homes will cause an increase in vehicles, which the current insufficient road infrastructure cannot support. - Canvey Island is a flood zone 3a, which is the highest probability of flooding, and is already heavily urbanised with limited green spaces. Any use of remaining green belt land for development will add to the already high flood risk and could impact the overall safety of residents. Members raised the following point in relation to policy number ENV3: • Concerns that proposed development sites may not have taken into consideration the protection of local wildlife. Members raised the following points in relation to policy numbers C1 and C10: • The proposed	Developments near Hazardous Uses. Development proposals within the consultation zone will be assessed in accordance with the Health and Safety Executive (HSE) Guidance who may advise against development on health and safety grounds. The Council will place great weight on the recommendation provided by the HSE.	

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								to policy number C3: • There is a concern that the presence of the two COMAH sites within the C3 policy area already poses a threat of terrorism due to the nature of the sites, therefore, increasing development in this area raises concerns that any need for evacuation in the event of an emergency or terrorist incident will become unsustainable. Members raised the following points in relation to policy number HOU3: • Members noted that Canvey Island has an existing growing community, and concerns were raised that further development will bring an unsustainable influx of residents and the types of homes being proposed, are not affordable and primarily aimed at the local community.									development of some brownfield sites will limit and reduce much needed parking facilities for local shops and visitors. Members raised the following points in relation to policy number C3: • There is a concern that the presence of the two COMAH sites within the C3 policy area already poses a threat of terrorism due to the nature of the sites, therefore, increasing development in this area raises concerns that any need for evacuation in the event of an emergency or terrorist incident will become unsustainable		
0278-0001	Individual	Anthony	Salt on	Cartec Garage Ltd	Yes	B8	No		No	Not Stated	I am a local business on the Manor Trading Estate and have had a presence on the estate for years. I record here that Cartec Garage Ltd agrees with G&K Groundworks Ltd that the regulation 19 draft as presented is Unsound. For the record and as relayed in G&K Groundworks Ltd submission		No		Yes, attached is G&K Groundworks ltd's response		Our network does not extend to the Castle Point Plan area. The nearest access points to the SRN (M25 Junction 29 and Junction 30 and the A13/A1089 junction) are approximately 12 miles from the	Comments noted	N

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											1. CPBC have never engaged with me / my business about our future on this estate. 2. Have never informed as is on the council's regeneration web page at priority No 4 that CPBC intends to build houses on the Manor Trading Estate and move all the businesses on the MTE North of the Borough 3. I presume CPBC intends to compulsorily purchase my operational property! Again, I have not been consulted at all ! This is very worrying and concerning. I am certainly more confused now! Where am I going to be re-homed? This Regulation 19 along with the recent green belt review indicates that the area North where we are moving to, has been identified as GB16 and has been discounted as it is not a viable! Option. I would like to record my total disbelief that CPBC along with our local councillors think it's OK to treat us the MTE business community with total disrespect. Suffice – I record again that this draft plan is unsound as it has not engaged with the business on the MTE at all. Albeit we are the drivers of the local economy. Perhaps CPBC might				to the consultation		Castle Point boundary, via the A127 and A13 respectively. Given the locations of the development, we anticipate that much of the traffic generated would be contained within the Castle Point boundary and the surrounding area. Whilst it is unlikely that the development would generate significant new trips on the A13 and M25, we note that Policy C5 is focused on improving access to and around Canvey Island. It is acknowledged that the A13 and A130 are key access points into Canvey Island and that the junctions and a feasibility study will be carried out to identify their options for improving access to, from and within Canvey Island, including its wider strategic implications. Some key collaboration		

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											remove that Regeneration Priority Frightening Statement and actually support the local business						partners are identified although National Highways is not mentioned specifically.		
0349-0001	Organisation	Stephen	Garner	Castle Point		TC5		The Planning Service has observed a notable increase in complaints relating to Disturbance during unsociable hours, which is common with takeaway operations and short-term holiday lets. These impacts are inconsistent with the character and purpose of residential neighbourhoods, which are intended to provide a peaceful and secure environment for residents. Uses of this nature are more appropriately located in designated commercial areas such as town centres, shopping parades, or industrial estates, where infrastructure and planning controls are better suited to manage their effects. Permitting such uses within residential areas risks setting a precedent that could erode the integrity of these communities, leading to cumulative harm and a decline in quality of life for								A	Policy TC5. Objects to hot food takeaways in residential zones.	Part 1 of the policy states 'New hot food takeaways or fast food outlets will <i>only</i> be permitted in town centres, local shopping parades or in out of centre retail parks' subject to further conditions. The inclusion of the word 'only' is considered to cover the concern, since it is implicit in the wording that hot fod takeawasy should'nt be located in residential areas, but only in town centres, local shopping parades.	N

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								long-term residents. It is therefore recommended that the Castle Point Plan is clear within its policies that it resists the encroachment of commercial activities into residential zones, except where they are demonstrably ancillary, low-impact, and appropriately regulated.											
0274-0001	Organisation	Kit	Welch	Chelmsford City Council	Not Stated	Forward	Yes	It is noted by Chelmsford City Council that CPBC has engaged with neighbouring authorities under the Duty to Cooperate to seek assistance meeting their housing need and were unable to do so. This includes approaching CCC in 2022 in CPBC's response to the Chelmsford Local Plan Issues and Options Consultation Document. CCC recognises there may be some challenges and constraints on developable land in CPBC's administrative area, however CCC reiterate that they are unable to help meet any of CPBC's unmet housing need. CCC confirms that it wishes to continue to actively engage with CPBC on each other's respective Local Plans and relevant strategic cross-boundary matters including housing, employment, transport infrastructure, education, Gypsy, and Travelling	Yes				Not Stated		No	A	It is noted by Chelmsford City Council that CPBC has engaged with neighbouring authorities under the Duty to Cooperate to seek assistance meeting their housing need and were unable to do so. This includes approaching CCC in 2022 in CPBC's response to the Chelmsford Local Plan Issues and Options Consultation Document. CCC recognises there may be some challenges and constraints on developable land in CPBC's administrative area, however CCC reiterate that they are unable to help meet any of CPBC's unmet housing need.	Points noted.	N

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								provision, and Essex Coast RAMS.									CCC commends the Plan's place-led approach and its clear commitment to environmental stewardship, climate resilience, and nature recovery.		
0274-0002	Organisation	Kit	Welch	Chelmsford City Council	Not Stated	Hou6	Yes	CCC welcomes the full provision of the required Gypsy and Traveller Sites within the administrative boundary of CPBC.	Yes				Not Stated		No	A	CCC welcomes the full provision of the required Gypsy and Traveller Sites within the administrative boundary of CPBC.	Noted	N
0274-0003	Organisation	Kit	Welch	Chelmsford City Council	Not Stated	Sustainable Development	Yes	CCC commends the Plan's place-led approach and its clear commitment to environmental stewardship, climate resilience, and nature recovery. We welcome the inclusion of Policies SD4 and SD5, which address both operational and embodied carbon, aligning with national net-zero ambitions. CCC also suggests strengthening delivery mechanisms for retrofit and energy efficiency in existing housing stock. CCC suggests exploring cross-boundary opportunities for climate adaptation infrastructure, especially in relation to water management and heat resilience.	Yes				Not Stated		No	A	We welcome the inclusion of Policies SD4 and SD5, which address both operational and embodied carbon, aligning with national net-zero ambitions. CCC also suggests strengthening delivery mechanisms for retrofit and energy efficiency in existing housing stock. CCC suggests exploring cross-boundary opportunities for climate adaptation infrastructure, especially in relation to water management and heat resilience.	Support for policies SD4 and SD5 noted and suggestion for exploring cross-boundary opportunities for climate adaptation infrastructure	N

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																	CCC confirms that it wishes to continue to actively engage with CPBC on each other's respective Local Plans and relevant strategic cross-boundary matters including housing, employment, transport infrastructure, education, Gypsy, and Travelling provision, and Essex Coast RAMS.		
0663-0001	Individual	Rob	Lillis	Christopher Sargent Associates	Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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1426-0001	Agent	John	Ferguson	Collective Planning	Yes	SP3	No	Introduction BlueSquare Homes Ltd represents Thundersley Investments Ltd and owners of the site located to the south of The Chase, Thundersley. The company unifies the owners into a consortium to promote residential development at the site. Options have been granted to BlueSquare Homes Ltd by the owners, who empower them to speak on behalf of all those owners. A site location plan showing the land our client owns is attached at Appendix 1. Our client is in the process of bringing forward a residential led scheme through the planning process, and has engaged with planning officers through a pre-application process over the past 5 years. The site previously formed part of a site allocation for new housing in the previous (now withdrawn) Local Plan, that was found sound by an Inspector (Inspector's Report at Appendix 2). Approach to Housing Provision The Regulation 19 Consultation refers to the standard housing methodology target of 11,662 new homes over the plan period or 686 dwellings per annum. However, the Regulation 19 Consultation sets an	No		Further sub area assessment of GB12 in the appendices again confirms weak contributions of the site to purposes a and c of the Green Belt and no contribution to purpose b. The conclusion states, "If the sub-area were released it would be unlikely to significantly harm the performance of the wider Green Belt due to its self-contained nature within the built-up area of Thundersley and reflecting its isolation from the wider Green Belt." The same site was also tested at the previous Local Plan examination. In this instance the Inspector concluded at para 106, "Given the need for housing which cannot be accommodated within the existing urban area and the limited harm to the Green Belt, I find that there are exceptional circumstances for removing this site from the Green Belt." This is therefore one example of a recognised poor performing Green Belt site that the Local Authority has chosen to not release from the Green Belt for housing. This demonstrates that the housing target is flawed as they are unprepared to utilise Green Belt sites (that do not meet the purposes of the Green Belt) to meet the housing need. The housing	Site GB12 should be a site that is removed from the Green Belt for the reasons set out above, to ensure it can make an optimum contribution to meeting housing need, and the current approach of the Local Plan to adopt a lower housing target when there are developable sites that could be used for housing is unsound.			Yes, Site Boundary and Report to Castle Point Borough Council by Philip Lewis BA(Hons) MA MRTPI an Inspector appointed by the Secretary of State		Site GB12 should be a site that is removed from the Green Belt for the reasons set out above, to ensure it can make an optimum contribution to meeting housing need, and the current approach of the Local Plan to adopt a lower housing target when there are developable sites that could be used for housing is unsound.	Noted	N

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								alternative housing target of 6,196 new homes. There are a number of reasons given for this reduced target including the historical low rate of delivery, Green Belt restrictions, and infrastructure constraints. The housing target of 6,196 (almost half the required target under the housing standard methodology), is fundamentally flawed. As set out in the NPPF, the Government's objective is to significantly boost the supply of homes, with the overall aim to meet an area's identified housing need. The fact that the Local Authority has Green Belt land is not a legitimate reason to arrive at such a reduced housing target. This position also contradicts a previously held position the Local Authority took on the release of Green Belt land for housing under the previous Local Plan (that was found sound by the Inspector (2023), but not adopted by the Local Authority). In this instance the Inspector (at paragraph 45 of the report) stated 'there are strategic level exceptional circumstances to alter the Green Belt boundary to meet housing needs in the interests of the proper long-term planning of the Borough'. The			number and the position on not releasing further Green Belt sites for redevelopment is therefore unsound and an 'exceptional' departure from the standard housing target is unjustified. Site GB12 Contribution to Housing Green Belt matters in relation to housing targets are addressed above. Site GB12 is used as an example of a recognised poorly performing Green Belt site meeting the exceptions test for release from the Green Belt. However, aside from Green Belt considerations, this site is considered within the SHLAA as being viable and developable, and therefore must be considered as a viable option for housing. The SHLAA confirms the site's suitability for development against all criteria except for local wildlife site 'unknown'; contaminated land 'unknown' and public open space 'unknown'. These matters can all be addressed through a planning application scheme. This site is particularly well suited to housing as recognised by the SHLAA, but also for the following reasons: - Limited Contribution to Wider Green Belt								

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								reasoning included: The need for housing; and The supply and availability of land suitable for sustainable development. This plan proposed the release of a number of Green Belt sites for housing. It should be noted this was under a more restrictive NPPF position on Green Belt release, that has since changed and made provision for exceptional circumstances for a review of Green Belt boundaries. The NPPF is clear that exceptional circumstances include instances where a Local Authority cannot meet its identified need for homes through other means. It is therefore considered that exceptional circumstances apply here to review Green Belt boundaries. The Local Authority will claim the Green Belt review provides evidence that reviewing the Green Belt boundaries would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan, however the Green Belt Assessment confirms areas of Green Belt that are considered to make no or limited contribution to the purposes of the Green Belt. The Assessment considers			The site is surrounded by built development on all 4 sides. This comprises housing to the south, east and north, and various uses including civic, leisure and education to the west. Therefore, the site is already largely enclosed by existing development and impact of this site being developed on the openness of the green belt is very limited - Sustainable Location The site is located in a sustainable, accessible location in Thundersley. Benfleet railway station is approximately 2.7km to the southwest with services to London Fenchurch Street, Southend Central, Shoeburyness and Leigh On Sea. There are bus stops along Kiln Road, the closest being the Warren Chase bus stops, which have services operating towards Benfleet railway station, Rayleigh, Basildon Town Centre, Canvey, Southend-on-Sea and North Shoeburyness. The site is in close proximity to a number of local shops, services and amenities, particularly immediately to the west of the site where Castle Point Borough Council, Runnymede Leisure Centre Runnymede Hall and USP College are								

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								site GB12 The Chase. Figure 14 from the Assessment shows this site makes a ‘weak’ performance against the purposes of the Green Belt overall and Table 12, figure 16 and figure 18 states the site could be considered grey belt upon consideration of Green Belt purposes a and b.			located. - Public Benefits Alongside the potential for the site to deliver new housing and affordable housing, the site also has the ability to improve public access and improved permeability through the site. Currently the site is privately owned and whilst there are informal routes through the site that neighbouring residents sometimes use, there is an ability of a new development to provide public access through the site linking east to west and north to south. This will benefit residents of the surrounding area, improving access to the leisure, civic and education uses to the west. As well as public footpaths the scheme can also provide cycle routes through the site. Any new scheme will also deliver new public open space that will significantly benefit the wider area. - Protection of Higher Quality Green Belt The site is in a sustainable location, surrounded by development. It is therefore considered a less sensitive site than other green belt sites in the district. Allowing this site to come forward for housing will ensure								

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											protection of the more sensitive, less accessible green belt sites in the district.								

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1097-0001	Agent	.	.	Cove UK c/o Laister Planning Limited	Yes	SP3	No	Please see Supporting Statement	No	Positively prepared, Effective, Justified, Consistent with national policy	See supporting statement for full site justification and proposal. 1.1 This Local Plan Representation submission has been prepared in relation to land east of Kings Park Village (the site), on land owned by Castle Point Borough Council. Kings Park Village (KPV) itself is owned by Cove UK. 1.2 The Local Planning Authority (LPA, or Council) in relation to this representation and therefore the site is Castle Point Borough Council (CPBC). 1.5 This submission seeks to identify the site as a suitable site that should be removed from the Green Belt, being 'Grey Belt' land (as defined in the NPPF), and subsequently allocated for residential purposes in the forthcoming Castle Point Local Plan for around 50 residential static caravans/park home pitches (falling within the definition of caravans found in the Caravan Sites and Control of Development Act 1960 (the 1960 Act) for permanent residential occupation by older or elderly persons, without care (i.e. independent living). 1.6 The remainder of this representation sets out the background of the site, its	Please remove land east of Kings Park Village from the Green Belt and allocate it for up to 50 residential park homes	Yes	Not Answered	Yes	C	Green/Grey Belt Not meeting housing numbers	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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											current use, policy context, and the reasons why the site is suitable for residential development, having regard to the national and local guidance and finally whether the site is deliverable having regard to guidance in the Planning Practice Guidance (PPG). 8.1 Laister Planning Limited has been instructed by Cove UK, to submit a representation to Castle Point Borough Council for the development of Land East of Kings Park Village (currently adjacent to Canvey Heights Country Park). 8.2 The proposal for this site would provide a park home (static caravan) development for elderly persons by extending the existing caravan park known as King’s Park Village. 8.3 The site is located on the edge of Canvey Island which is classified as a large settlement within the borough of Castle Point, providing a good range of goods and services. The settlement is located south of South Benfleet and Hadleigh, with good road access via the B1014 and A130, offering a wider range of services and employment opportunities. 8.4 The Council previously														Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons,	

ID Ref	Individual/Organisation/Age nt?	Firs t Na me	Last Na me	If orga nisat ion - nam e	Has agree d to publi catio n of Name /Com ment s?	Poli cy/ Par a No.	2a. Leg ally Co mp lia nt?	2b. If No, explanation	3a. So un d?	3b. Positive/Eff ective/Justif ied/Consist ent?	3c. Explanation	4. Suggested modifications	5. Wi sh to par ti ci pat e in ex am	6. Wh y?	Sup porti ng Evid enc e sup plie d?	Opt ion A, B or C	Summary	Officer Response	Mods Require d
											concluded that the land performed poorly in Green Belt terms, and proceeded to allocate the site for caravan-based residential development in the previous 2018 Local Plan. An Inspector found that the proposed allocation was “sound”, subject to minor modifications. Unfortunately that Local Plan did not proceed towards adoption. However, as set out in this report, there are no changes to the site’s characteristics or national policy that would indicate that the previous proposed allocation should not be re-iterated with this new emerging Local Plan. The site remains suitable for residential development. 8.5 There is a clear demand for housing allocations, with the present emerging Local Plan allocating insufficient land to meet the identified needs. There is also clear guidance that the Council should be allocated sufficient land for specialist housing needs for the elderly, including homes that facilitate independent living. The land east of King’s Park Village is a suitable location. 8.6 Indeed, the site is "deliverable" within the context of the Government's guidance.							when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose.	

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											That is to say that it is "suitable", "available" and "achievable". It should have been included within SLAA for residential development, to assist with the preparation of a new LP for Castle Point. 8.7 It is suitable because the caravan site falls within the NPPF definition as a Grey Belt, following the change in government and the new designation of Grey Belt land. It is therefore desirable to use it for alternative purposes, so long as the development can be made sustainable. This report demonstrates that the proposals can comply with the NPPF and would be a form of sustainable development. There are no environmental or physical constraints to the site that would prevent its use for residential purposes, and it is not presently allocated for some other use. 8.8 The Grey Belt site would benefit from the relevant NPPF policies regarding its development, where there is a need to find land for housing. 8.10 The site is also "achievable", as it is already adjacent to a caravan park and there are no obvious viability constraints for its use as a residential park home site. There is a														Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.	

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											growing need for the provision of homes for the elderly in the Borough, for example, which will be met in part by the use of KPV for permanent residential homes for older persons. 8.11 In conclusion, the site proposed should be allocated as it represents a sustainable Grey Belt site that can be developed quickly and easily to assist in meeting the Council's requirements for a variety of housing options. The previous proposed allocation for the site should be re-iterated in this Local Plan, to make this plan “sound”. As otherwise, the Local Plan is neither justified nor consistent with national policy and should be considered “unsound”. 8.12 Laister requests that the Council deallocate the land east of King’s Park Village from the Green Belt and allocate this land for housing. It should also inset the former draft Policy HO31 from the									
0991-0001	Organisation	David	Knight	CPRE Essex (Campaign for the Protection of Rural	Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N	

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				England)															
0790-0001	Individual	Debbie	Purkis	Deborah Jean	Yes	SP3	No	Failed to consider strategic alternatives for example North West Thundersley. No credible 5 Year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with National Policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/Grey Belt against new NPPF guidelines. The Draft Local Plan is not justified. Site selection strategy is biased and predetermined towards a "No Greenbelt build policy". Site selection is based on the "over development of Brownfield sites " Not considered all sites, no greenbelt/grey belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. the 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Add North West Thundersley site, 187Ha, a Greenbelt/GreyBelt/Brownfield option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000	No	Not Answered	Not Answered	A	Not meeting standard method Lack of Five Year Housing Land Supply Green/Grey Belt not considered North West Thundersley Flood Risk on Canvey Emergency Evacuation Concerns	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in	N

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																		Castle Point. The Castle Point Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's	

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																		Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten	

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																		years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the	

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																		Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local	

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																		highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was	

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																		not preferred. Flooding on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA	

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																		and IDP, including in relation to Canvey. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/	

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0288-0001	Individual	Noah	Anwo	Debyet Tradings Ltd	Yes	B8	No	I am a local business on the Manor Trading Estate and have had a presence on the estate since 2006. 1st I record that I have had the opportunity to read and fully understand my neighbour “G&K Groundworks Ltd” Unsound submission. For clarity I attach a copy of G&Ks submission to this e-mail.	No	Not Stated	I record here that Manor Training Centre UK Ltd agree with G&K Groundworks Ltd.’s that the regulation 19 draft as presented is Unsound. For the record and as relayed in G&K Groundworks Ltd submission • CPBC have never engaged with me / my business about our future on this estate. • Have never informed as is on the council’s regeneration web page at priority No 4 that CPBC intends to build houses on the Manor Trading Estate and move all the businesses on the MTE North of the Borough • I presume CPBC intends to compulsorily purchase my operational property! Again, I have not been consulted at all this is very worrying and concerning. I am certainly more confused now! Where am I going to be re-homed? This Regulation 19 along with the recent green belt review indicates that the area North where we are moving to has been identified as GB16 and has been discounted as it is not a viable! Option. I would like to record my total disbelief that CPBC along with our local councillors think it’s OK to treat us the MTE business community	Perhaps CPBC might remove that Regeneration Priority Frightening Statement and actually support the local business.	No		Yes, attached is G&K Groundworks Ltd's response to the consultation		The regulation 19 draft as presented is Unsound. CPBC have never engaged with the business community on Manor Trading Estate. Have never informed as is on the council’s regeneration web page at priority No 4 that CPBC intends to build houses on the Manor Trading Estate and move all the businesses on the MTE North of the Borough I presume CPBC intends to compulsorily purchase my operational property! Again, I have not been consulted at all this is very worrying and concerning. Some Background G&K are the title owners of HMLR EX498233 the footprint is 1.22 ha just over 3 acre’s which is except for connect packaging the largest single commercial / industrial premises on the Manor	Policy B8 part 6 states 'A programme of renewal of the industrial and commercial building stock within the estate with the overall aim of an increase in floor space of at least 10%' Paragraph 9.28 states ' It is not the intention of the Master Plan to result in a loss of employment on this site. Overall, the Master Plan should seek a modest increase in the floor space available for industrial and commercial uses to support economic growth. This will be secured through the revised approach to design and parking.'	N

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											with total disrespect. Suffice – I record again that this draft plan is unsound as it has not engaged with the business on the MTE at all. Albeit we are the drivers of the local economy.						Trading Estate. Benfleet Essex. (MTE) G&K houses 28 tenants, albeit CPBC are fully aware of those tenants & business as this draft document clearly states CPBC have engaged with them all. For the avoidance of doubt and I engage with all my tenants on a at least a weekly basis not one of them has had any engagement with CPBC officers, councillors nor CPBC co-opted Deyton Bell. Fact this property has warehousing & storage buildings along with separate offices and external yards • 10 units have a warehouse footprint of 2400sq ft along with attached offices of 600 sq. ft and associated attached yards of 1200 sq. ft • 3 Units of 1200 sq. ft with 300 sq. ft office & 600 sq. ft of attached rear yard		

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																	• It has 1 exceptionally large yard of over 20,000 sq. ft which is houses a significant 14 MW power station that feed the local grid. So, a significant contributor to the local economy. • It has 13 yards ranging from 1250 sq. ft to 5400 sq.ft. We are full to the brim. We continually must turn away enquiries for warehousing and offices. Aside from G&K Groundworks Ltd and its 28 tenants it appears from conversation with other business on the MTE they have not been engaged with. Yet this draft document along with the many website uploads. All indicate that our opinions are reflected in this draft plan. That is not true! Questions over consistency with CPBC Regeneration policies		

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0319-0001	Agent	James	Chapman	Discovery Land and Planning		SP3	No	This representation addresses the soundness of the Castle Point Local Plan (Regulation 19). While the Council has made progress towards plan-making, the Publication Draft is unsound as it significantly under-provides for housing need, relies on unrealistic assumptions in its trajectory, overstates supply, and fails to make adequate provision for affordable housing. The Council has also not adequately explored reasonable alternatives such as densification, redevelopment of low-density estates, and managed garden land capacity. Key issues: - Housing requirement is set at 6,196 dwellings (364 dpa) compared with a local housing need of 11,662 dwellings (686 dpa), leaving a gap of 5,466 dwellings. - The trajectory is backloaded: 1,045 homes in years 1–5; 1,268 in years 6–10; and 3,883 in years 11–17. Many sites only deliver from 2028/29 or later. - Over-counting: Council includes dwellings scheduled beyond the plan period and holiday home replacements (Thorney Bay) in its supply. - Extant permissions are counted without any non-				Suggested Modification: Reassess the housing requirement, test reasonable alternatives including urban densification, estate renewal, and garden land capacity, and plan positively to close the gap.				A	Significantly under-provides for housing need, Relies on unrealistic assumptions in its trajectory, Overstates supply, and fails to make adequate provision for affordable housing. The Council has also not adequately explored reasonable alternatives such as densification, redevelopment of lowdensity estates, and managed garden land capacity. Key issues: - Housing requirement is set at 6,196 dwellings (364 dpa) compared with a local housing need of 11,662 dwellings (686 dpa), leaving a gap of 5,466 dwellings. 11–17. Many sites only deliver from 2028/29 or later. - Extant permissions are counted without any non-delivery discount (despite evidence that 10% of permissions	Noted	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
								delivery discount (despite evidence that 10% of permissions lapse). - Affordable Housing: The LHNA (June 2025) identifies a need for 1,458 AH units (86 p.a.), but allocations are expected to deliver only 954, with most Affordable Housing dependent on one single site (C4) not delivering until late in the plan period. - Council has not properly assessed the redevelopment potential of low-density Council-owned estates or the contribution from garden/backland redevelopment. The plan therefore fails the NPPF tests of being positively prepared, justified, effective, and consistent with national policy. 1. Housing Requirement Shortfall Problem: The Plan sets a provision of 6,196 dwellings (364 dpa), while the standard method (Dec 2024) requires approximately 686 dpa (11,662 dwellings), leaving a shortfall of 5,466 dwellings. This under-provision is contrary to NPPF paragraph 61. Why Unsound: Not positively prepared, not justified, not consistent with national policy.									lapse). The plan therefore fails the NPPF tests of being positively prepared, justified, effective, and consistent with national policy.		

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0319-0002	Agent	James	Chapman	Discovery Land and Planning		SP3	Not Stated	Problem: The Council adopts a stepped trajectory (1,045 / 1,268 / 3,883) which backloads delivery to later years. The SLAA shows all allocations do not start until 2028/29 or later. The Council also counts dwellings beyond the plan period (200 units each from C1 and Had1 scheduled to be delivered after the plan period are included in the 6,196 calculation) and holiday home replacements (Thorney Bay). Extant permissions are counted with no discount for non-implementation.	No	Effective, Justified	Why Unsound: Not effective, not justified, risks failing to maintain a 5-year supply.	Suggested Modifications: - Replace stepped trajectory with a realistic annual profile based on site-specific phasing and build-out rates. - Remove from the supply any dwellings scheduled beyond the plan period. - Exclude holiday/one-for-one replacement units unless evidence proves they are permanent net additions. - Apply a non-delivery discount (10% or more) to extant permissions.			Yes	A	Key Issues - The trajectory is backloaded: 1,045 homes in years 1–5; 1,268 in years 6–10; and 3,883 in years - Over-counting: Council includes dwellings scheduled beyond the plan period and holiday home replacements (Thorney Bay) in its supply.	Noted	N
0319-0003	Agent	James	Chapman	Discovery Land and Planning		HO U2		3. Affordable Housing Delivery Problem: The LHNA (June 2025) identifies a need for 1,458 affordable homes (86 p.a.). Policy H2 requires Affordable Housing to be calculated at 10% on Brownfield above commercial, 20% on Brownfield and 30% on Greenfield on allocations, which equates to 954 units across all allocated sites. Site C4 provides 600 of these dwellings (62% of the total projected delivery, with this site not scheduled to deliver any units in the first 10 years of the plan period. If all allocated sites deliver their affordable housing requirement in line with the trajectory outlined in the Housing Topic Paper				Suggested Modifications: - Increase AH requirements where viable. - Increase number of allocated sites. - Accelerate delivery on small Council-owned or brownfield sites. - Publish an AH delivery plan with monitoring triggers if delivery falls short. Illustrative Affordable Housing Delivery vs Need: Category Units Timing Issues Identified Need (LHNA, 2025) 1,458 86 per annum required Expected Supply from Allocations (Policy H2) 954 Majority dependent on Site C4 Shortfall			Yes	A	- Affordable Housing: The LHNA (June 2025) identifies a need for 1,458 AH units (86 p.a.), but allocations are expected to deliver only 954, with most Affordable Housing dependent on one single site (C4) not delivering until late in the plan period.	Noted	N