

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		
											criterion would require it to be demonstrated that the relevant proposals at the site were in the national interest, a potentially onerous requirement for which no justification has been provided. 5. The National Policy Statement for Ports (NPSfP) – a national policy statement to which the emerging plan has to have regard to in terms of port facilities and port development matters - similarly does not require it to be demonstrated that port development is in the national interest in order for it to be approved. Again, only proposals in certain designated areas, or affecting certain designated areas in a particular way, are required to meet a such onerous policy test along these lines – circumstances which do not apply to the Oikos facility. In fact, the NPSfP makes it clear in the section providing guidance to the decision maker on the need for additional port capacity (section 3.5) that the need for future capacity should be accepted and that consequently there should be a presumption in favour of granting consent for port development infrastructure. Having regard to the Government’s								seeks to ‘explore’ such opportunities rather than imposing a definitive position. Unfortunately, however, this understanding has not been reflected in the draft policy. Policy C3 (e) The purpose of including this criterion is unclear and appears unnecessary. The starting point for the assessment of development proposals is the consideration of compliance against all policies within the Local Plan. The need to explicitly require compliance with two specific policies is, therefore, not apparent and results in a duplication that is unjustified.		

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											proposed revisions to the NPSfP (published in June 2025) the national policy position on the need for port development is, in Oikos’ view, likely to further be strengthened. 6. The NPPF highlights that planning should encourage sustainable economic growth and create the conditions to build a strong, competitive economy in which businesses can invest, expand and adapt. Significant weight is to be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (paragraph 85). The imposition of onerous policy restrictions is particularly significant in respect of port facilities, which, as the NPSfP makes clear, operate in a market-led industry where competition between ports is encouraged (paragraphs 3.3.1 and 3.4.13). 7. The unsound nature of this criteria is further illustrated by the fact that a situation could arise where an application for an alteration to the facility includes a change of material handled that does not result in an									

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											unacceptable change in the level of hazard or risk and is acceptable to the Health and Safety Executive (and thereby meets other relevant criteria of the policy) but is able to be refused because it cannot be demonstrated to be in the national interest. 8. Finally, leaving aside the above, this suggested policy criterion is not effective. Having correctly recognised that the facilities being referred to are of national significance, it would seemingly be possible to argue that any development proposal put forward in connection with them would be in the national interest. For the reasons summarised above, criterion b. of draft policy C3 needs to be deleted. Policy C3 – Criterion d. 9. Oikos understands the importance of protecting public access along the coastal path that runs along the southern boundary of the facility. Criterion d. of the draft policy, however, extends further than protection and requires that opportunities to enhance access ‘will be’ sought. 10. As noted within the reasoned justification text									

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											both the Oikos and Calor facilities are registered as Control of Major Accident Hazard (COMAH) sites due to the nature of the goods received and stored at the sites. Taking a blanket approach to proposals in such a sensitive location is not considered to be justified or effective. Paragraph 8.30 of the reasoned justification appears to acknowledge the need for flexibility in this location and seeks to ‘explore’ such opportunities rather than imposing a definitive position. Unfortunately, however, this understanding has not been reflected in the draft policy text. 11. Maintaining safety and security at the Oikos facility is paramount, and it is within this context that enhanced access must be considered. Proposed amendments to the policy wording regarding these matters are outlined below. Policy C3 – Criterion e. 12. The purpose of including this criterion is unclear and appears unnecessary. The starting point for the assessment of development proposals is the consideration of compliance against all policies within the Local									

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											Plan. The need to explicitly require compliance with two specific policies is, therefore, not apparent and results in a duplication that is unjustified. 13. Furthermore, stipulating instances where consideration is ‘especially’ relevant suggests that in other instances it is less so. Thus, reducing the clarity of the criterion and the policy’s effectiveness. Such a flexible approach to compliance is not replicated within Policies ENV3 and SD4, and as such, results in internal inconsistencies within the Local Plan. It is suggested that this criterion should be removed.								
1012-0002	Agent	Arun	Srisankanda	Oikos Storage Ltd c/o Adams Hendry Consultin	Yes	C3	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	Paragraph 8.27 – Oikos would highlight that this paragraph only provides a partial description of the type of products which its facilities handle. Increasingly, as the nation transitions to net zero, the Oikos facility handles various sustainable fuel products.	Oikos also suggests that additional clarification is made to the supporting text at paragraph 8.27 as indicated in its comments above.	Yes	Not Answered	Yes	A	Paragraph 8.27 only provides a partial description of the type of products handled at this facility	It is aimed to provide a brief explanation and considered acceptable, however please see modification added to include "various sustainable fuel products".	8.27 There are two port facilities located adjacent to each other at south Canvey. These port

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				g Ltd															facilities include the Calor Gas terminal located to the west of Thames Road for the importation and storage of liquefied petroleum gas and the Oikos terminal to the east of Haven Road, which receives and stores oil and a range of hydrocarbon products and various sustainable fuel products. Both terminal s...

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1012-0003	Agent	Arun	Srisankanda	Oikos Storage Ltd c/o Adams Hendry Consulting Ltd	Yes	C3	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	Paragraph 8.30 - Oikos acknowledges the need to take account of the requirement to improve flood defences adjacent to its site in the future, but the proposed way in which the presubmission Plan is seeking to do this is unsound. Regard should be had to Oikos' separate representation on policy SD1 in respect of the safeguarded area referred to in paragraph 8.30.		Yes	Not Answered	Yes	A	Objecting to the 19m buffer referred to at paragraph 8.30	This is addressed in more detail at the comments for SD1 at entry 1012-0005	N
1012-0004	Agent	Arun	Srisankanda	Oikos Storage Ltd c/o Adams Hendry Consulting Ltd	Yes	Policies Map	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	In addition to the above points, Oikos questions why the photograph in the draft plan that sits alongside the policy is an aerial image of a fuel refinery facility and not an image of either the Oikos facility or the Calor facility. The use of a refinery image is potentially misleading as to the type of activities which take place at both the port facilities on Canvey Island. Oikos would highlight that in respect of its facility on Canvey Island the policies map is a little difficult to understand in terms of the various allocations and designations which have been drawn and may have a number of errors in terms of the boundaries shown. For example, the northern boundary of the 'Port Related Facilities' area does not appear to match the 'on the ground'	The policies map should be reviewed and amended as appropriate to make sure that it accurately reflects relevant boundaries and is made easier to understand.	Yes	Not Answered	Yes	A	In addition to the above points, Oikos questions why the photograph in the draft plan that sits alongside the policy is an aerial image of a fuel refinery facility and not an image of either the Oikos facility or the Calor facility. The use of a refinery image is potentially misleading as to the type of activities which take place at both the port facilities on Canvey Island. Oikos would highlight that in respect of its facility on Canvey Island the policies map is a little difficult to understand in	Agree to replace the photo. Agree to amend the Policies Map to correct errors and readability concerns in response to Oikos comments.	Y - Change the photograph so it shows the Canvey facilities (Current one is wrong oil terminal). Update northern boundary of the 'Port Related Facilities' area to match the 'on the ground'

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											boundary of those facilities. Another query is that the proposed green lung designation appears to have been extended across a part of the 'Port Related Facilities' area. Having regard to the fact that the policies map is the way in which a reader of the plan is able to identify the various areas referred to in the policies of the plan, it is important that the policies map itself is accurate to avoid future misunderstanding.						terms of the various allocations and designations which have been drawn and may have a number of errors in terms of the boundaries shown. For example, the northern boundary of the 'Port Related Facilities' area does not appear to match the 'on the ground' boundary of those facilities. Another query is that the proposed green lung designation appears to have been extended across a part of the 'Port Related Facilities' area. Having regard to the fact that the policies map is the way in which a reader of the plan is able to identify the various areas referred to in the policies of the plan, it is important that the policies map itself is accurate to avoid future misunderstanding.		boundary of those facilities and to remove overlap with South Canvey Green Lung. Address styling issues where multiple layers are overlapping causing difficulty in readability.

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1012-0005	Agent	Arun	Srisankanda	Oikos Storage Ltd c/o Adams Hendry Consulting Ltd	Yes	SD1	Yes		No	Positively prepared, Justified, Consistent with national policy	20. Policy SD1 deals with, amongst other matters, the ability to protect and enhance the existing flood defences on Canvey Island. Criterion 4 of the policy sets the provision of a 19m buffer zone from the existing flood defences on Canvey Island, to ensure land is safeguarded for future flood defence works, landscaping, environmental enhancements and amenity. 21. As currently worded, the criterion does not take into account that the buffer extends through the operational Oikos facility – including areas containing critical operational infrastructure - and essentially sterilises that section of the site from future development. It is Oikos' view that this blanket approach does not acknowledge the different requirements of the land uses located along the coastline, and places undue restrictions on these land uses, including the operations of the nationally significant Oikos facility. Furthermore, it is not clear to Oikos what evidence the 19m distance is based upon or why it is necessary for a blanket safeguarding for landscaping, environmental enhancements and amenity	If it is considered necessary for Policy SD1 criterion 4 to be included, then this needs to be redrafted along the following lines A buffer up to 19m wide of land adjacent to the existing flood defence structure on Canvey Island, as shown on the Policies Map, is safeguarded to enable consideration to be given to the need for future flood defence works within the area. For any development proposals coming forward within the safeguarded zone the Council will consult with the Environment Agency to determine the extent of land required to be kept free from development.	Yes	Not Answered	Yes	A	Object to Policy SD1(4) provision of 19m buffer since the criterion does not take into account that the buffer extends through the operational Oikos facility – including areas containing critical operational infrastructure - and essentially sterilises that section of the site from future development. It is Oikos' view that this blanket approach does not acknowledge the different requirements of the land uses located along the coastline, and places undue restrictions on these land uses, including the operations of the nationally significant Oikos facility. If it is considered necessary for Policy SD1 criterion 4 to be included, then this needs to be redrafted along the following lines A buffer up to 19m wide of land	it is considered that Plan paragraphs 21.14 and 21.15 cover the need for early discussions with the Environment Agency at a very early stage in the event of formulating development proposals within the safeguarded sea defence area.	N

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											measures in addition to flood defence works. 22. Oikos primary view is that such a blanket safeguarding is unnecessary because there already exists a process separate to the ‘planning process’ whereby development in close proximity to flood defence infrastructure has to be approved by the Environment Agency through its flood risk activity environmental permitting process. It is an established principle that the planning process should not seek to duplicate controls that are already achieved through a separate process or regime. Rather the planning process is to simply assume that such separate regimes operate effectively. 23. If, however, such a policy is to be included in the local plan it is highlighted that the draft policy as worded does not reflect Oikos’ understanding of the discussions held during the previous Castle Point Borough Council Local Plan Examination. It is Oikos’ understanding that the position reached previously was that such a policy should indicate that the suitability of proposals within the 19m area will be considered on a case-by-						adjacent to the existing flood defence structure on Canvey Island, as shown on the Policies Map, is safeguarded to enable consideration to be given to the need for future flood defence works within the area. For any development proposals coming forward within the safeguarded zone the Council will consult with the Environment Agency to determine the extent of land required to be kept free from development.		

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											case basis and that agreement on the acceptability or otherwise of a proposed development would be determined through the development management process as a result of consultation between the applicant and the Environment Agency (EA) as necessary. It is noted that the importance of early discussions with the EA regarding such works is emphasised within the reasoned justification for the policy (paragraph 21.15), which appears generally to suggest that the approach to be taken to development proposals within the suggested safeguarded zone is as Oikos understands from the previous discussions. 24. It is Oikos' position that there is no justification for an approach to future works to flood defences which is not positive towards and supportive of proposals that may need to come forward within this area of the facility. Such an approach is inconsistent with national policy that strongly advocates economic growth (NPPF paragraph 85) and the ability for ports to be able to expand and adapt to meet market demands (NPSfP paragraphs 3.3.1 & 3.4.13). If such a policy is to be									

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											included in the plan, then amended wording of the criterion, which seeks to add flexibility to the text and reflects the discussions that were undertaken as part of the Examination into the previous Local Plan, is set out below.								
1012-0006	Agent	Arun	Srisankanda	Oikos Storage Ltd c/o Adams Hendry Consulting Ltd	Yes	C6	Yes		No	Effective, Justified	Whilst Oikos acknowledge that the policy has been amended to reflect the previous Local Plan Inspector's report regarding the removal of references to landscape and openness, it is considered that the policy still contains unnecessary duplication with policies SP1, ENV3 and ENV4 and, therefore, remains unjustified and ineffective. Policy C6 continues to protect the area for its ecological value; however, it is noted that the land is already safeguarded through its designation under Policy ENV4 as a Local Wildlife Site (LWS) and Potential Local Wildlife Site – which are the subject of a separate representation by Oikos. Similarly, the overarching	Policy C6 should be deleted.	Yes	Not Answered	Yes	A	Policy C6 should be deleted. Duplication with policies SP1, ENV3 and ENV4 and, therefore, remains unjustified and ineffective.	Noted. Policy C6 is considered to have an important role to warrant retention.	N

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											protection of ecologically valuable sites, securing nature recovery, and the provision of Biodiversity Net Gain are outlined through Policy ENV3. Furthermore, the importance of green infrastructure and the value it provides in connecting ecological networks is addressed through policy SP1. On this basis, it is not clear why an additional policy is required to cover the same matters. It is Oikos' view, therefore, that for the purposes of clarity, this policy should be deleted.								
1012-0007	Agent	Arun	Srisankanda	Oikos Storage Ltd c/o Adams Hendry Consulting Ltd	Yes	ENV 4	Yes		No	Effective, Justified	Oikos supports the position stated in the Castle Point Local Wildlife Sites (LWS) Review 2023 that confirms the additional land at Brick House Farm Marsh, which in previous versions of the Local Plan had been included within the Local Wildlife Site (LWS) area, was not of sufficient value to meet the selection criteria. As such, it has been redesignated as a Potential Local Wildlife Site (PoLWS)(Brick House Farm Marsh Extension). As the leaseholder of these sites, Oikos would be grateful to be advised of any future review of these sites. 30. Oikos welcomes the subsequent reduction in the extent of the LWS at Brick House Farm Marsh, noting	Oikos would politely request that criteria 1-3 within the policy are combined to remove duplication and criterion 4 is amended to provide clarity on the differing policy requirements for existing and potential Local Wildlife Sites.	Yes	Not Answered	Yes	A	Oikos request that criteria 1-3 within the policy are combined to remove duplication and criterion 4 is amended to provide clarity on the differing policy requirements for existing and potential Local Wildlife Sites. Request for criterion 4 is amended to provide clarity on the differing policy requirements for existing and potential Local Wildlife Sites.	Noted. Changes are not considered necessary. Criteria 4 has been amended, please see mods list.	N

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											the boundary has been reverted to the position outlined in 2012. Unfortunately, this position is not clearly shown on the polices map due to the quality of the image but also because of the overlap of the Green Lung designation covering the same area of land and making the boundary difficult to identify. Notwithstanding this and on the basis that what is shown on the policies map reflects the boundaries in the LWS Review document, Oikos would like to make the following further points. 31. Oikos notes that there would appear to be duplication within the first three criteria of the policy. All three refer to the conservation and enhancement of either existing or potential LWS and/or Local Geological Sites. Oikos consider that this duplication is unnecessary and ineffective, and the wording should be amended to provide clarity. 32. Furthermore, Oikos notes from the suggested wording of criterion 4 that there is no apparent difference in policy terms and the various requirements set out, between a site that is a LWS and a site which is a								

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											PoLWS. This is an unjustified approach, which in effect means the same level of policy protection is given to an existing LWS as to one that only has the potential to be an LWS. The policy should, however, clearly differentiate between existing and potential sites to reflect the difference in their ecological value.								
1012-0008	Agent	Arun	Srisankanda	Oikos Storage Ltd c/o Adams Hendry Consulting Ltd	Yes	ENV 2	Yes		No	Effective	Oikos consider that the policy as currently drafted is ineffective and therefore unsound as it does not acknowledge the strategic importance of the port and other employment facilities located along the river. Any strategy that relates to the coastal and riverside areas of the borough should take due account of such land uses and should be worded appropriately. 35. Oikos notes the Council's intention to work with the EA, ECC, lead local flood authority, neighbouring authorities and the community to prepare the Strategy. Further to the point made above and Oikos' operational infrastructure being located both adjacent to and extending into the River Thames, Oikos would politely request that they are involved as appropriate	Oikos would politely request that the wording of the policy is amended to include appropriate references to the port and other employment facilities within the coastal and riverside area.	Yes	Not Answered	Yes	A	Oikos consider that the policy as currently drafted is ineffective and therefore unsound as it does not acknowledge the strategic importance of the port and other employment facilities located along the river. Any strategy that relates to the coastal and riverside areas of the borough should take due account of such land uses and should be worded appropriately. Oikos notes the Council's intention to work with the EA, ECC, lead local flood authority, neighbouring authorities and the community to prepare the	The Plan should be read as a whole and Port Facilities are covered by Policy C3, for which the supporting text acknowledges that they ' <i>are nationally significant and have a role to play in ensuring the security of energy supplies in the UK.</i> ' Therefore, it is considered that there strategic importance is already recognised within the Plan. Policy element 1 sets out that the Strategy will involve relevant stakeholders.	N

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											in the drafting of the strategy.						Strategy. Further to the point made above and Oikos' operational infrastructure being located both adjacent to and extending into the River Thames, Oikos would politely request that they are involved as appropriate in the drafting of the strategy. Oikos would politely request that the wording of the policy is amended to include appropriate references to the port and other employment facilities within the coastal and riverside area.		
1012-0009	Agent	Arun	Sriskan da	Oikos Storage Ltd c/o Adams Hendry Consulting Ltd	Yes	C5	Yes		Yes		Oikos welcomes the Council's aspirations to improve access to and around Canvey Island, but as highlighted in representations relating to the previous version of the Local Plan, such improvements are not required to enable the Oikos facility to continue to operate successfully or to accommodate any future potential development at the facility. They could, however, provide additional		Yes	Not Answered	Yes	A	Not required for the operation of the oikos facility and wants to be consulted as this develops	Comments noted	N

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											resilience benefits in respect of the ongoing operations of this nationally significant facility. Oikos would politely request that, along with the other stakeholders referred to in the plan, they are involved as appropriate in the production of the feasibility study.								
1012-0010	Agent	Arun	Srisankanda	Oikos Storage Ltd c/o Adams Hendry Consulting Ltd	Yes	Policies Map	Yes		Yes		Oikos welcome the inclusion of the HSE consultation zones associated with its facility, and that the zones appear to be accurate and reflect the latest position. It is noted, however, that due to the clarity of the plan, it is difficult to confirm this and to clearly interpret the extent of the designations both covering and in the vicinity of the Oikos facility. In addition, there appear to be certain errors in the boundaries that have been drawn – as explained further within Oikos’ representation on draft policy C3. It is suggested that a higher quality plan is submitted in order for Oikos (and others) to confidently confirm this position and to understand the boundaries of the designations that affect the site.		Yes	Not Answered	Yes	A	Oikos welcome the inclusion of the HSE consultation zones associated with its facility, and that the zones appear to be accurate and reflect the latest position. It is noted, however, that due to the clarity of the plan, it is difficult to confirm this and to clearly interpret the extent of the designations both covering and in the vicinity of the Oikos facility. In addition, there appear to be certain errors in the boundaries that have been drawn – as explained further within Oikos’ representation on draft policy C3. It is suggested that a higher quality plan is submitted in order for Oikos	Agree to amend the Policies Map to correct errors and readability concerns in response to Oikos comments.	Y - Amend and tidy the Policies Map in relation to Oikos comments

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																	(and others) to confidently confirm this position and to understand the boundaries of the designations that affect the site.		
1012-0011	Agent	Arun	Srisankanda	Oikos Storage Ltd c/o Adams Hendry Consulting Ltd	Yes	E1	Yes		Yes		Oikos welcomes and supports the acknowledgement within the policy that the South Canvey Port Facilities are a strategic employment area for the Borough and that the facilities are key industrial assets (paragraph 14.27) which provide scope for economic growth through the energy sector (paragraph 14.9).		Yes	Not Answered	Yes	A	Oikos welcomes and supports the acknowledgement within the policy that the South Canvey Port Facilities are a strategic employment area for the Borough and that the facilities are key industrial assets (paragraph 14.27) which provide scope for economic growth through the energy sector (paragraph 14.9).	Support noted	N
1012-0012	Agent	Arun	Srisankanda	Oikos Storage Ltd c/o Adams Hendry Consulting Ltd	Yes	SD6	Yes		Yes		Oikos welcome and supports the inclusion of criterion 3 within the Policy, which relates to the principle of the agent of change and requires development proposals adjacent to or in the vicinity of existing businesses to demonstrate that they will not prejudice the continuing operations of those existing businesses.		Yes	Not Answered	Yes	A	Oikos welcome and supports the inclusion of criterion 3 within the Policy, which relates to the principle of the agent of change and requires development proposals adjacent to or in the vicinity of existing businesses to demonstrate that they will not prejudice the continuing	Support noted	N

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																	operations of those existing businesses.		
0988-0001	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	SP3	No		No	Positively prepared, Effective, Justified, Consistent with national policy	2. Policy SP3 – Meeting Development Needs The Housing Requirement 2.1. The new Plan confirms that the starting point for assessing local housing need is the standard methodology, which establishes a housing requirement for Castle Point of 686 dwellings per annum, equating to 11,662 homes over the Plan period. This is agreed as being the most recent figure, and it is welcomed that the Council recognises this is a variable figure due to changes in affordable housing ratios and housing stock which inform the figure. 2.2. However, this is only the starting point but not the correct housing requirement figure as no buffer has been applied. The NPPF 2024 requires the application of a buffer of a minimum 5%. Given the context in Castle Point of a poor housing delivery record, and given the identified supply for the new Plan is wholly from the Urban Area, this buffer should really be at least 10%. A robust and appropriate buffer is		Yes	Not Answered	Yes	A	Doesn't meet Standard Method Housing number or correctly apply buffer. The Council's evidence does not support the growth strategy set out in SP3 of providing for only half of the housing growth required by the Standard Method. Approach to Green Belt conflicts with NPPF para 146 and the Council's own Green Belt Assessment (July 2025), Disagrees with rejection of GB5 suggesting flawed criteria. The Transport Assessment process for potential Green Belt allocations has not been undertaken in a robust, appropriate and sound manner. This casts considerable doubt on the Council stating transport impacts as a reason for not releasing any Green	<u>Housing Supply – Government Housing Target and Standard method</u> 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 Castle Point's approach to the site review is outlined within the Housing	N

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											important to allow for a sufficient supply of sites that factors in potential under-delivery of the allocated capacity, or the slow delivery of allocated sites. This in turn ensures there is no risk of not being able to meet the minimum local housing need. 2.3. Notwithstanding the above, the Policy SP3 seeks to deliver only 6,196 homes over the 17 year plan period, or 364 dwellings per annum. The new Plan provides various reasons for being unable to meet local housing need in full. The first is that it would “destroy large tracks [sic] of Green Belt, including land which strongly contributes to the Green Belt purposes”. 2.4. This reason conflicts with NPPF paragraph 146. The exceptional circumstances for releasing Green Belt land have been established, with the Council affirming that the Urban Area is insufficient to accommodate local housing needs in full. Paragraph 146 confirms that, where exceptional circumstances are established, Green Belt land should be released “unless the review provides clear evidence that doing so							Belt land at all for development. The Housing Topic Paper refers to the “Essex Parking Guidance Connectivity Map” as an indicator for the sustainable connectivity of a site. This is quite evidently not the purpose of the mapping produced by Essex County Council, which is for the purpose of guiding parking standards. The mapping reflects the current situation, rather than accounting for the opportunities available for site permeability and connectivity which would increase accessibility of the site to services and facilities. The use of this mapping in this manner by the Council is therefore not appropriate or robust. Notwithstanding this, the mapping shows that the site has areas of connectivity that ranges from High to Low. The new Plan	Capacity Topic Paper August 2025. Within the NPPF Paragraph 11 section b (a) and (ii) give an acknowledgement of circumstances in which national policy does not expect Standard Method outcomes to be met in full. The Sustainability Appraisal (July 2025) provides the evidence of the negative impacts arising from an increase in the housing requirement. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Duty to Cooperate</u> Duty to Cooperate: Addressed in the Duty to	

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											would fundamentally undermine the purposes (taken together) of the remaining Green Belt.” 2.5. This reason also ignores the Council’s own Green Belt Assessment (July 2025), which identifies areas of Green Belt that do not strongly contribute to the Green Belt purposes. Taking Land West of Benfleet (GB5) as an example, the Green Belt Assessment confirms that the overall performance of this parcel against the Green Belt purposes is “Moderate”, and that if the parcel were to be released, “that it would be unlikely to significantly harm the performance of the wider Green Belt owing to its limited size relative to the wider Green Belt and its position to the very west of the plan area”. This is just one example, but clearly show that the Council has not taken a sound approach in determining that there should be no release of Green Belt despite the existence of exceptional circumstances. 2.6. Another reason that is given is “protecting and enhancing the natural environment set out in policy SP1”. However, this has not been assessed						suggests that the local plan evidence base demonstrates that the release of Green Belt land to meet local housing need in full is not feasible. This is disputed Argues that the Infrastructure Delivery Plan confirms that infrastructure needs arising from a higher level of housing growth can be met. The Housing Topic Paper seeks to make the argument that allocating Green Belt (greenfield) sites to increase the housing requirement would reduce the attractiveness of regeneration opportunities on brownfield sites in the urban area. However, the developers interested in developing each type will be different. Market Capacity: There is no evidence that there is a risk of “overallocation” of	Cooperate Statement and supporting Statements of Common Ground. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).	

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											through the Habitat Regulations Assessment and no evidence is provided that the release of Green Belt would lead to greater impacts than the current strategy. A straightforward presumption cannot be made that a greenfield site will have a higher biodiversity value than a brownfield site. A greenfield site in agricultural use can have a very low biodiversity baseline, while a brownfield site could contain open mosaic habitat which is high value, irreplaceable habitat. 2.7. Additionally, Policy SP1 conflates Green Belt with Green Infrastructure. Green Belt is an urban containment policy. It is not an environmental protection on the same level as Local Wildlife Sites, Ancient Woodland, or designated public open space (which are referred to in SP1 alongside Green Belt). This is demonstrated in the Housing Capacity Topic Paper (August 2025) which demonstrates that GB5 is not constrained by any environmental designations (footnote 7 constraints), and is not identified as an area of particular importance for biodiversity in the LNRS. The Topic Paper does						housing in a constrained market area. Ultimately, developers would not be promoting sites for development if there was no market demand for the homes, and they would certainly not take on the significant costs associated with preparing planning applications. Five Year Supply: Suggests that at the point of adoption (if this version of the Plan were to ever reach adoption), the Council would not be able to demonstrate a five year housing supply. This is not in compliance with the NPPF or the NPPG. Suggest a lack of a housing trajectory Windfalls: SP3 identifies a windfall allowance of 45 dwellings per annum. The Housing Topic Paper clarifies this is based on an average of the		

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											indicate that GB5 includes Open Space. However, this is only because the Council has expanded the GB5 boundaries to include the adjoining Arthur Stevens' playing fields and Romsey Road Allotments. Persimmon is not promoting these parcels of land for development, and requests they be removed from the GB5 site boundary for all assessment and other purposes – in line with the site boundaries shown on the “Potentially Unconstrained Green Belt Map”. 2.8. Another reason given is “potential impact to heritage assets”. The evidence base contains no Borough-wide Heritage Assessments, only two site-specific assessments. Again therefore, no evidence is provided to support this reasoning. 2.9. Having confirmed that there are parcels of Green Belt land within the Borough that are not constrained by environmental, ecological or open space designations. Highway impacts and sustainable access are given as a further reason for not releasing Green Belt land development. The Council has undertaken a Green						homes delivered on sites of less than five dwellings over the period 2013 to 2025. However, this does not take into account the difficulties that are currently being faced by the small and medium housebuilders who deliver this level of housing. Looking instead at the period between 2020 to 2025, the average delivery on small sites has been only 36 dwellings per year. Indeed, in 2023/24 only 26 dwellings were delivered, and this fell further still to 15 dwellings in 2024/25. The Housing Topic Paper also refers to the work undertaken for the SLAA a supporting a windfall allowance of 45 dwellings per annum. However, only a cursory look at the “Potential Windfall Sites Missue with this approach. Two of these potential sites are located on London Road. The first, at 32 London		

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											Belt Sites Assessment (July 2025) which has conducted site-specific assessments of all promoted Green Belt sites. The Assessment makes conclusions on the sustainability of each site. However, the results that have been reached are questionable. Again, the assessment for GB5 is used as an example to highlight Persimmon’s concerns for the wider assessment process. 2.10. First is the development quantum of GB5. The site boundary has been drawn to include playing fields and allotments located on the north-western boundary. Persimmon has no intention to include existing open space within the development boundary. No regard appears to have been had of existing development within the site, some of which is to be retained. The application of a gross density of 40 dwellings per hectare is also not accurate, as it does not account for the delivery of policy requirements such as open space, non-residential development etc. within the site. A development quantum of 1,308 dwellings is quoted; the above demonstrates that this is highly inaccurate								Road, is a parking area to the rear of a block of affordable homes – with the car park clearly labelled “for residents”. The second site is further to the east, at 80 London Road, and is again a parking court for residents. Thirdly, Policy B9 – South Benfleet Playing Fields seeks to masterplan as a multi-functional green space. The above examples demonstrate that even the Council’s reduced housing target is unlikely to be achieved. This is to be expected when a strategy relies solely on brownfield sites. For an effective housing strategy, a range of sites – small, strategic, greenfield, brownfield – need to be identified. In summary, there is limited technical justification for the dismissal of alternative spatial			

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											and unrealistic. Based on the site that is actually promoted by Persimmon, a quantum of up to 850 dwellings is more realistic for the purpose of undertaking assessment work. 2.11. This use of a wrong development quantum means the trip generation modelling and development impacts is inaccurate and cannot be relied upon. This needs to be reviewed and updated by the Council. 2.12. Notwithstanding this critical error, the Assessment goes on to conclude that there is limited potential for modal shift to sustainable transport. Persimmon disagrees with this assessment. The site is within easy walking distance (between 5 and 15 minutes) of several existing education, health and leisure facilities and bus stops, with the Tarpots Town Centre being at most a 20 minute walk from the site. There are already food connections to the existing footway network with opportunities existing for further enhancements to be made, particularly on Jotmans Lane. The same is applicable to cycle accessibility, with							strategy options and previously considered Green Belt development sites that might have enabled the Borough to meet its housing need in full. There is no clear demonstration that all reasonable alternatives, including those that would meet the full housing need, have been adequately assessed and tested. The new Plan is not positively prepared, not justified, and not compliant with national policy. There has also been no consideration of the legal requirement of opportunities for unmet need to be accommodate through the Duty to Co-operate. It therefore fails on all the soundness tests.		

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											opportunities available to connect to existing and planned strategic cycle routes which would provide another transport mode to local facilities, including crucially Benfleet Train Station. 2.13. Lastly, the Council’s Assessment concludes that bus access would be poor. Which seems to be based on a conclusion that direct access on to the A130 Canvey Way is not feasible. Even if that was the case, the size of the development proposed would justify the diversion of existing bus services into the site, or the introduction of a new bus service to serve new residents. One potential diversion could be via Wavertree Road and Jotmans Lane, which would not require an access onto Canvey Way. This would though be a positive measure that would encourage residents to travel by bus; making the service more attractive by bringing the route into the site itself. 2.14. The above demonstrates that the Transport Assessment process for potential Green Belt allocations has not been undertaken in a robust, appropriate and										

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											sound manner. This casts considerable doubt on the Council stating transport impacts as a reason for not releasing any Green Belt land at all for development. 2.15. The Housing Topic Paper refers to the “Essex Parking Guidance Connectivity Map” as an indicator for the sustainable connectivity of a site. This is quite evidently not the purpose of the mapping produced by Essex County Council, which is for the purpose of guiding parking standards. The mapping reflects the current situation, rather than accounting for the opportunities available for site permeability and connectivity which would increase accessibility of the site to services and facilities. The use of this mapping in this manner by the Council is therefore not appropriate or robust. Notwithstanding this, the mapping shows that the site has areas of connectivity that ranges from High to Low. 2.16. The new Plan suggests that the local plan evidence base demonstrates that the release of Green Belt land to meet local housing need in full is not feasible.								

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											However, the above has demonstrated that this is not the case. This is also agreed in the Council’s own Housing Capacity Topic Paper – in section 13, the Paper confirms that while much of the Borough’s Green Belt is subject to constraints, there are 17 Green Belt sites which are unconstrained and therefore suitable for consideration for development. This list includes GB5, GB2 and GB12, all of which are also identified through the Green Belt Assessment (July 2025) as potential Grey Belt. The sites therefore meet the sequential approach required by paragraph 148 – the exceptional circumstances for Green Belt development has been established, and there are Grey Belt sites available which can be prioritised for development ahead of the remainder of the Green Belt. 2.17. The Housing Topic Paper clearly agrees, confirming that the three sites (among others) can be taken forward for further consideration, albeit with a reduced area for GB2 to address heritage constraints. Despite this clear assessment of there being no overarching									

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											constraints, the Housing Topic Paper makes no conclusion that there is the ability to provide additional homes on housing delivery. The Paper concludes with a discussion of other considerations, but these are not presented as being sufficient evidence that development on Green Belt land is not feasible. These other considerations include: • Infrastructure: The Infrastructure Delivery Plan confirms that infrastructure needs arising from a higher level of housing growth can be met. The Housing Topic Paper suggests the need arising for a new primary school may be a constraint if a higher housing requirement is imposed, however the Council will be well aware that GB5 has been promoted with the ability to deliver non-residential uses, which could take the form of a primary school. This is therefore not a robust argument against increasing the housing requirement. • Regeneration: The Housing Topic Paper seeks to make the argument that allocating Green Belt (greenfield) sites to increase the housing requirement would reduce								

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											the attractiveness of regeneration opportunities on brownfield sites in the urban area. However, this misses the point that these are two very different forms of sites and the developers interested in developing each type will be different. It is also not the case that greenfield sites are automatically easier to develop with less infrastructure requirements compared to brownfield sites. The development management policies in the new Plan demonstrate well the increased requirements that are placed on greenfield sites, such as open space, affordable housing and sustainable transport provision. In addition, a strategic Green Belt site such as GB5 will have its own associated infrastructure requirements – to be delivered at considerable cost. • Market Capacity: As with the above, there is no evidence that there is a risk of “overallocation” of housing in a constrained market area. Ultimately, developers would not be promoting sites for development if there was no market demand for the homes, and they would certainly not take on the significant costs associated with preparing planning								

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											applications. 2.18. The Housing Topic Paper makes no strong argument that the above considerations carry sufficiently weight to disregard all Green Belt sites entirely. 2.19. The Council could point to the Sustainability Appraisal (July 2025) as providing the evidence of the negative impacts arising from an increase in the housing requirement. However, the Housing Topic Paper makes no reference to these impacts, so there is a disconnect between the two documents, calling into question the soundness of the evidence base. 2.20. Even if it were accepted that there could be some negative impacts arising from the release of Green Belt land. The negative impacts of not releasing Green Belt, and so not meeting housing needs in full, also need to be considered. Again, the answer is in the Council's own evidence base, specifically the Equality Impact Assessment (July 2025). This clearly sets out the negative impacts that would be had on the economic and housing prospects for young people,									

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											the negative impacts on community infrastructure requirements, particularly for the Jewish Community, the negative impacts on those looking for affordable homes, for starter homes, for accessible homes, or just homes in general. These homes cannot be sufficiently provided through the Council’s current spatial strategy. The Equality Impact Assessment conclusion is clear: “Ensure that the housing needs of the borough is met and have awareness of how the provision of housing can impact those with [protected] characteristics”. 2.21. The Council has provided no evidence that these negative impacts associated with the current spatial strategy of not providing for local housing needs in full have been considered in the balance against potential negative impacts associated with Green Belt release. The above discussion has shown that there are deficiencies in the robustness of the Council’s assessment process for Green Belt sites, with GB5 used as just one example. The Council’s own evidence shows that there are								

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											unconstrained Green Belt sites, like GB5, that could be released for development without leading to significant impact on the purposes of the wider Green Belt, or other impacts. This aligns with the conclusions of previous development plans prepared by this same Council, which have allocated GB5 and other Green Belt sites for development (and those allocations have been supported by the Examining Inspector). 2.22. In conclusion, Persimmon Homes highlights that the Council's evidence does not support the growth strategy set out in SP3 of providing for only half of the housing growth required by the Standard Method. There are clearly opportunities available to increase the housing requirement, and to achieve a sound Local Plan the Council must demonstrate that it has explored all opportunities to maximise growth in seeking to achieve local housing need (which itself is the minimum housing requirement that a development plan should be aiming for). Persimmon Homes strongly recommends that the									

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											Council do not submit the new Plan for Examination until it has been reviewed in line with the above, updated and subject to a further consultation. It is considered that the current form of the new Plan is very unlikely to be found sound due to the deficiencies in SP3. The Supply 2.23. Notwithstanding the above discussion on the robustness of the current proposed housing requirement. It is acknowledged that the level of delivery proposed in the Castle Point Plan Regulation 19 Draft would be an increase in supply over current (poor) levels of delivery. However, this is a stepped housing delivery. SP3(4) indicates that even this reduced housing requirement will only be met on an annual basis in the final seven years of the Plan period, with only 209 homes per annum allocated for delivery in the first five years, and 253 homes per annum in years 6-10. Meaning at the point of adoption (if this version of the Plan were to ever reach adoption), the Council would not be able to demonstrate a five year housing supply. This is not								

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											in compliance with the NPPF or the NPPG. 2.24. No detailed trajectory has been provided (for both new allocations and existing commitments) to demonstrate the above. This should have been made available now given this is a Regulation 19 Pre-Submission Plan to allow for interrogation. This is necessary for a sound and robust housing supply figure. 2.25. Paragraph 6.51 states that the stepped housing trajectory reflects the certainty the Council has in the delivery of sites, with sites that are less certain being pushed to later in the Plan period. The evidence behind this reasoning must be shared, as any site where there is a reasonable level of uncertainty around deliverability should not be included in the new Plan as a potential allocation at all. 2.26. Indeed, there are questions around the deliverability of the allocations that have been identified by the Council. Persimmon Homes highlights a couple of examples below, but it is for the Council to ensure that robust evidence is provided on the deliverability of all								

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											allocations – which includes a housing trajectory. 2.31. SP3 identifies a windfall allowance of 45 dwellings per annum. The Housing Topic Paper clarifies this is based on an average of the homes delivered on sites of less than five dwellings over the period 2013 to 2025. However, this does not take into account the difficulties that are currently being faced by the small and medium housebuilders who deliver this level of housing. Looking instead at the period between 2020 to 2025, the average delivery on small sites has been only 36 dwellings per year. Indeed, in 2023/24 only 26 dwellings were delivered, and this fell further still to 15 dwellings in 2024/25. 2.32. The Housing Topic Paper also refers to the work undertaken for the SLAA a supporting a windfall allowance of 45 dwellings per annum. However, only a cursory look at the “Potential Windfall Sites Maps” reveals the issue with this approach. Two of these potential sites are located on London Road. The first, at 32 London Road, is a								

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											parking area to the rear of a block of affordable homes – with the car park clearly labelled “for residents”. The second site is further to the east, at 80 London Road, and is again a parking court for residents. Thirdly, Policy B9 – South Benfleet Playing Fields seeks to masterplan as a multi-functional green space. 2.33. It must be emphasised this is based on only a cursory review of the mapping, but the issue is clear. 2.34. The above examples demonstrate that even the Council’s reduced housing target is unlikely to be achieved. This is to be expected when a strategy relies solely on brownfield sites. For an effective housing strategy, a range of sites – small, strategic, greenfield, brownfield – need to be identified. 2.36. In summary, there is limited technical justification for the dismissal of alternative spatial strategy options and previously considered Green Belt development sites that might have enabled the Borough to meet its housing need in full. There is no clear demonstration that all								

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											reasonable alternatives, including those that would meet the full housing need, have been adequately assessed and tested. The new Plan is not positively prepared, not justified, and not compliant with national policy. There has also been no consideration of the legal requirement of opportunities for unmet need to be accommodate through the Duty to Co-operate. It therefore fails on all the soundness tests.								
0988-0002	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	HO U2	No		No	Positively prepared, Effective, Justified, Consistent with national policy	2.35 In addition, it is noted that Policy Hou2 only requires 10% affordable housing provision on urban sites (all affordable ownership), with a further 10% on urban sites (social rent) where no commercial development is provided. Given urban sites comprise the majority of the Council's identified supply, this would result in a		Yes	Not Answered	Yes	A	Objects to 10% addordable housing provision on urban sites with a further 10% on urban sites (social rent) where no commercial development is provided. Questions the viability of this.	This requirement is supported by the Castle Point Plan Viability Study.	N

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											maximum of 20% affordable provision arising from the current identified housing supply. Although the viability of this provision has not been justified, and is therefore questionable. Given the already poor affordable housing provision historically in Castle Point, which has led to an affordability crisis, there is no justification for further limiting opportunities for affordable housing provision.								
0988-0003	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	HOU3	No		No	Positively prepared, Effective, Justified, Consistent with national policy	3.1. The qualification in Policy Hou3 that the stated mix is an initial benchmark is supported. Various site and other factors can determine the most appropriate housing mix for a site. It should also be recognised that the LHNA on which the benchmark housing mix is based is already two years old, and needs will continue to change and evolve over the Plan period. 3.2. The proposal to split the housing mix provision between “Premium Sustainability Areas” and “All Other Areas” is laudable, but ultimately disjointed in its reasoning. The assumption seems to be that the most sustainable and well connected sites are those located within the urban		Yes	Not Answered	Yes	A	The benchmark mix would be applied on a case-by-case basis should be included within the policy wording itself, to further emphasise the flexibility of the policy.	The council considers the supporting text to be sufficient	N

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											area, and so will be constrained in their ability to deliver larger homes at a higher quantum, while sites located outside of the urban area are the least sustainable. This is a broad generalisation that is not always true in practice. Take Land West of Benfleet (GB5) as an example, which is extremely well related to the urban area, with multiple opportunities for connections to existing streets and footpaths leading towards existing services, facilities (including Tarpots Town Centre) and public transport. 3.3. The supporting text reiterates that the benchmark mix would be applied on a case-by-case basis. Given the above inconsistencies in the reasoning behind the policy, it is recommended that this is drawn from the supporting text into the policy wording itself, to further emphasise the flexibility of the policy.								
0988-0004	Agent			Persimmon Homes Ltd c/o Pegasus	Yes	HOU4	No		No	Positively prepared, Effective, Justified, Consistent with national policy	4.1. Persimmon seeks to build homes that can be comfortable and liveable for the long term. The provision of homes built to M4(2) and M4(3) standards is therefore supported. However, this is subject to policies being sound, which		Yes	Not Answered	Yes	A	Objects to policy HOU4 as it lacks evidence for the M4(3) requirement.	Evidence for this requirement can be found in the Housing Needs Assessment 2023.	N

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				Group							in this case means the Council providing evidence that there is a need for M4(2) / M4(3) provision, and demonstrating that this provision has been appropriately accounted for in the viability assessment. 4.2. In accordance with the NPPG, any policy requirement for homes to be built to either M4(2) or M4(3) standards will need to be supported and justified by robust evidence. The requirement for M4(3) in particular is not clear in its calculation. It is stated there is an existing need for 1,140 M4(3) homes in the Borough (of which some need will be met through the conversion of existing homes), which will rise by 400 units between 2023-2043. This represents 8% of the Council's Local Housing Need figure of 5,100 homes. 4.3. The above has been translated into a benchmark figure of 8% of new homes to be built to M4(3) standard. The link between need and policy requirement has not been justified.								
0988-0005	Agent			Persimmon Homes	Yes	D3	No		No	Positively prepared, Effective, Justified, Consistent	5.1. Clear criteria need to be provided of when the Council would expect a masterplan to be provided, the detail that a masterplan		Yes	Not Answered	Yes	A	Clear criteria of the detail needed for the masterplan and	Officers will work closely with developers to ensure that the masterplan is	N

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				Ltd c/o Pegasus Group						with national policy	would need to cover, and the approval process for a masterplan. This will provide certainty to both applicants and decision makers, and ensure there is no unnecessary delay to the approval of planning applications – having regard to the resources available at the Council as well.						the approval process is needed	detailed. Policy D3 explains what is required.	
0824-0001	Representation withdrawn																		

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0825-0001	Individual	Jayne	Hodges		Yes	SP3	No	There is no credible 5 year housing land supply There has been no strategic alternatives such as the North West Thundersley area considered	No	Justified, Consistent with national policy	The draft plan is not consistent with national policy. This does not meet the housing target for Castlepoint. Site selection ignores Greenbelt/Greybelt against new NPPF guidelines Draft local plan is not justified. The site selection strategy is biased and predetermined towards a non greenbelt build policy. Site selection is based on the over development of brownfield sites. This has not considered all sites no green or grey belt land added with the exclusion of NW Thundersley, NPPF guidelines state development should be directed away from areas of 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 the North West 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 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 Castle Point. The Castle Point	N

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																		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 Standard method. However, once a	

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																		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 years of the plan the Council's aim is to deliver	

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																		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 Housing Capacity Topic Paper), the	

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																		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 highway network and Evidence that parts of our	

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																		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 not preferred. Flooding on	

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																		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 and IDP, including in relation to	

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																		Canvey. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/	

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0826-0001	Individual	Patricia	Walker		Yes	SP3	No	This plan has failed to consider strategic alternatives like North West Thundersly. Why not? This is not a credible 5 year housing land supply.	No	Justified, Consistent with national policy	This planet is NOT consistent with national policy. It does NOT meet the housing target for Castlepoint. The site selection ignores greenbelt/greybelt against NPPF guidelines. 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/greybelt sites added, and the exclusion of North West Thundersly site, which happens to be the perfect location for development! I do, however, do totally agree with Had2 policy for the Hadleigh Farm area, which states that this site is extremely important for environmental recreational, nature recovery, biodiversity, agricultural farming activities, nature conservation, SSS1, Ramsar site, ecological restoration, habitat creation and connectivity. It provides protection as an open space, promoting our heritage site, Hadleigh Castle, and whatever is planned for this site for the future, it does not have a significant impact on the landscape nor the greenbelt.	You must add North West Thundersly site to the Plan, as 187Ha as a greenbelt/greybelt site option for 7 500 homes. You must reduce the urban housing target from 6,200 to 3,500, with Canvey at 1,050 homes, and Hadleigh at 305. This is a total of 11,305, which is the amount specified by government.	No	Not Answered	Not Answered		No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	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 important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It	N

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											I also agree the Had2 Policy is about protecting this greenbelt as NOT suitable for development, but the unsound Local Plan for only 6,200 homes puts the Hadleigh Farmland site (GB8), at risk to speculative development, needing planning objections with respect to urban sprawl. IT IS A BUFFER ZONE. The effect on highways, traffic, and lack of infrastructure , protecting our Farmland and wildlife are paramount. Development on this Farmland would be out of character, with loss of open space, heritage, archeology sites, and historic links. Greybelt land MUST be used first. Any development on this site affects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support the Had2 Policy with absolutely NO housing development EVER on the Farmland. I am hoping that the Salvation Army agree with taking this direction. We need a C6 Policy for this Farmland site, which is the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.													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 land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see	

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																		housing topic paper. 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 not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with	

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																		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, 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	

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																		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 appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is	

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																		safeguarded by policy HAD3	

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0827-0001	Individual	Sonia	Looker		Yes	SP3	No	Failed to consider strategic alternatives..ie North West Thundersley. No credible fiveyear land supply.	No	Justified, Consistent with national policy	Not consistent with national policy.not meeting housing target for Castle Point ..site not taking Greenbelt or Greybelt into consideration....new guidelines... Lack of Infrastructure and for traffic....in this area gridlock	Greenbelt ..Greybelt ..Brownfield site look at North West Thundersley. housing target too high needs reducing massively in this area...	No	Not Answered	Not Answered		Not meeting standard method No five year housing land supply North West Thundersley Strategic alternatives Green/Grey Belt Infrastructure	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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																		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 Standard method. However, once a	

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																		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 years of the plan the Council's aim is to deliver	

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																		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 Housing Capacity Topic Paper), the	

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																		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 highway network and Evidence that parts of our	

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																		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 not preferred. Strategic	

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																		Alternatives All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
0828-0001	Individual	Keith	Broadhead		Yes	HAD2 (Policy Map)	No	Factualy incorrect. The cross-hatching representing the area and boundary of the farmland should coincide with the GREEN BELT boundary. This being the southern house fences of Castle Road, Park Chase, London Road [A 13] and western house fences of Tattersall Gardens.	No	Consistent with national policy	Drafting error requires correcting.	The cross-hatching representing the area and boundary of the Green Belt and farmland should coincide with the GREEN BELT boundary. This being the southern house fences of Castle Road, Park Chase, London Road [A 13] and western house fences of Tattersall Gardens.	No	Not Answered	Not Answered	A	HAD2 policy area to coincide with Green Belt boundaries	The area covered by Had2 has been specifically chosen to encompass Hadleigh Country Park, Hadleigh Farm and Benfleet and Southend Marshes and is not intended to cover the extent	N

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																		of the Green Belt.	
0828-0002	Individual	Keith	Broadhead		Yes	SP3	Yes	The difficulties of applying Government methodology for the whole of England, to the real situation pertaining to Castle-Point, is readily apparent when considered with the property facts given that 80% of homes are owner-occupied and the other 20% social or rented, As a resident of Hadleigh for some 10 years, the current housing density is now above 'comfortable' getting close to full. On-road parking is now at full capacity in residential roads and disabled mobility is severely impaired by obstructions such as vehicles parking on pavements and verges. Any more development will simply aggravate the already congested and inadequate infrastructure. As a long term objective the North West Thundersley proposal could be reconsidered (see Reg.18 Draft) for future residential development when the NEED and COST can be fully justified.	No	Justified		New planning permissions should require off-road parking for at least two vehicles. Grass verges are ruined by Illegal parking on kerbs or pavements and offenders should be effectively deterred. Pavements should have no sudden sharp changes of level as in Castle Lane. Licences (min £500) should be required for Utilities and others wishing to destroy the road surface. With 50% refundable on inspection and satisfactory reinstatement. Although further housing might be considered desirable by some there is absolutely no immediate NEED in Hadleigh.	No	Not Answered			No need for housing in hadleigh North West Thundersley	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.	N

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																		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. 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	

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																		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.	

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0828-0003	Individual	Keith	Broadhead		Yes	HAD2	Yes		No	Effective	Changes to better define precise meaning.	Suggested text adjustments in added CAPITALS. Within the area as identified on the Policies Map, the Council will support the following land uses and proposals for AGRICULTURAL development: 1. Proposals related to the improvement of recreational facilities within the Country Park and maintenance of the Country Park where they do not have a significant impact on the landscape or the Green Belt, and comply with the requirements of policy ENV4 and other relevant policies of this Plan; 2. NON-RESIDENTIAL OR NON-COMERCIAL proposals related to the development and/or use of the farm for agricultural and/or training purposes in line with the charitable mission of the landowner, where they do not have a significant impact on the landscape the Green Belt, and comply with the requirements of policy ENV4 and other relevant policies of this Plan; or 3. Proposals for habitat creation and habitat management and mitigation which are complementary to the	No	Not Answered			More precise wording to policy HAD2	Comment noted.	N

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												habitats which already exist on or near the site, with specific regard to the Southend and Benfleet Marshes SPA and Ramsar site. 4. Development proposals must be designed to enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS). 5. Development proposals must ensure areas that are identified as an Area of Particular Importance for Biodiversity (APIBs) within the Essex Local Nature Recovery Strategy (LNRS) are protected and where possible enhanced. Reasoned Justification (See 4, next comment for full modification) 10.18 The area to the south of Hadleigh Town Centre sits in the Green Belt. It is the site of the Salvation Army Farm which delivers training opportunities in line with the charitable mission of the Salvation Army. As farming practices change and develop, and the needs of the Salvation Army's clients also change, it will be necessary on occasions for the facilities at the farm to also change								

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												and adapt. 10.19 Essex County Council also manages Hadleigh Country Park. This was extended in 2012 to include land leased from the Salvation Army to provide the venue for the 2012 Olympic Mountain Biking. There are some amenities and facilities on this site for recreation including footpaths, multi-user paths, play equipment, café, toilets, parking, etc. There is also some small-scale ‘glamping’ provision. To ensure the viability of this facility into the long term it will be necessary on occasions for the facilities in the Country Park to change and adapt. 10.20 The site is however visually prominent, and provides the setting for Hadleigh Castle, a Scheduled Monument. It is therefore critical that any development allowed does not NEGATIVELY impact on the landscape. Furthermore, it is important that any recreational or farming activities are compatible with the nature conservation status of the area. 10.21 The southern part of the area is of significant nature conservation value. Benfleet and Southend Marshes Site of Special							

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												Scientific Interest (SSSI) covers an extensive area of the marshland and Hadleigh Ray creek, with a smaller area of this designated as a Special Protection Area (SPA) due to its importance as a habitat for birds. It is designated under international law as a Ramsar site due to the number of migratory birds present. Furthermore, the significance of the Hadleigh Castle and Marshes landscape is such that it has been identified as part of the nominated East Coast Flyway World Heritage site. 10.22 The LNRS identifies this area as a Strategic Opportunity Area. The Castle Point Green and Blue Infrastructure Strategy recognises the opportunities for remediation and ecological restoration to improve biodiversity in the short term, while habitat creation and improved connectivity between Hadleigh Park and Benfleet Marshes are a longer term aspiration.							

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0828-0004	Individual	Keith	Broadhead		Yes	HAD2	Yes		No	Effective	I feel the statement : ' The area to the south of Hadleigh Town Centre sits in the Green Belt. It is the site of the Salvation Army Farm which delivers training opportunities in line with the charitable mission of the Salvation Army. As farming practices change and develop, and the needs of the Salvation Army's clients also change, it will be necessary on occasions for the facilities at the farm to also change and adapt.' should be stronger.	Hadleigh Farm is in the area to the south of Hadleigh Town Centre contained entirely within the Green Belt, which was itself already reduced in size by the effects of an earlier housing development. It is owned by the Salvation Army which produces regular cereal and other crops as well as offering training opportunities in line with its charitable mission. Furthermore, as farming practices change and develop, and the needs of the Salvation Army's clients will also change and it will be necessary on occasions for the farming facilities to also change and adapt.'	No	Not Answered			Stronger wording to policy HAD2	Comment noted.	N

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0828-0005	Individual	Keith	Broadhead		Yes	HAD2	Yes		No	Effective	Likely MORAL & ETHICAL CONFLICT between the published Salvation Army INTERNATIONAL POSITIONAL STATEMENT, requiring its commitment to sustainable environmental practices, required to safeguard the integrity of creation. viz. Non destruction of land as created; as against being complicit in building development and the permanent destruction of land.	I fully support the Salvation Army programme of nature-friendly activities including the rewilding and other agricultural use, However, I was naturally aghast that the SA even considered allowing any of the Green Belt land under its protection, to be permanently destroyed, in complete contradiction of the Salvation Army's (SA) published INTERNATIONAL POSITIONAL STATEMENT, If, however, the SA has in fact withdrawn its housing development proposal (Reg 18, call for sites) in favour of retaining the farmland for farming it should be congratulated on its victory of PRINCIPLE over PROFIT. I include below some brief excerpts from the SA website stating its principles: (https://www.salvationist.org.uk/faith/social-justice-peacemaking/positional-statements/caring-environment#:~:text=Search- ,INTERNATIONAL%20POSITIONAL%20STATEMENT, Caring%20for%20the%20Environment,-Breadcrumb) Caring for the Environment: Statement of position The Salvation Army believes people are made in the image of God. He has	No	Not Answered			No homes on HAD2	No development of housing is proposed to the area covered by policy HAD2.	N

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												entrusted us to reflect his personality by caring for the Earth and everything in it. The Salvation Army recognises environmental degradation as one of the most pressing issues facing the world today, affecting us all. Its effects fall disproportionately on the most vulnerable, particularly in terms of health, livelihood, shelter and the opportunity to make choices. The very survival of humanity depends on the health of the whole ecosystem. In addition to being compelled by lived experience, The Salvation Army also accepts the scientific evidence that demands action on all levels to lessen the effects of environmental damage. It is committed to sustainable environmental practices which are required to safeguard the integrity of creation. This positional statement was approved by the General in July 2021. I presume that the removal of the offer of sites made by the SA in the Reg 18 proposal, it has sensibly decided not to accidentally jeopardise its hard earned							

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												and excellent reputation by its retraction. There is no current NEED warranting use of Green Belt farmland currently safeguarded by the Act. The SA publications also proclaim: Our mission, vision and values. Our Values. Integrity We will be honest and transparent in all our dealings with each other and those we serve, being open about our motives and agendas; Mutual accountability We will willingly and freely give full account for our actions to those we interact with and expect the same in return, recognising the link between individual responsibility and mutual accountability. Nature,Birds & Crops [REDACTED Personal Information] and observe PLOT F in Reg 18 on a daily basis. Last year, far from being a non-viable barren field, it yielded 217 cylindrical bales of hay/ fodder together with the associated harvest of								

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												multiple trailers full of grain/cereal. In the Spring prior to planting, several hundred Brent Geese arrived and no doubt will regather this Autumn on the plot before migrating to their breeding grounds. Endangered Slow-worms have again been observed. Any farmland/Green Belt surrendered to housing is a permanent, avoidable, and irretrievable Nature . Such actions, if sanctioned, will rightly be condemned by future generations. Please accept that by this comment I seek to highlight that our forefathers by way of Parliament recognised Urban Sprawl as the curse that needed strict control and did so by implementation of The Green Belt (London and Home Counties) Act 1938. This should not be lightly surrendered to Private profit,							

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0829-0001	Individual	Reece	Marshall		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-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/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	Not Answered	Not Answered		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 Castle Point.	The Castle Point	N

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																		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 Standard method. However, once a	

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																		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 years of the plan the Council's aim is to deliver	

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																		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 Housing Capacity Topic Paper), the	

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																		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 highway network and Evidence that parts of our	

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																		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 not preferred. Flooding on	

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																		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 and IDP, including in relation to	

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																		Canvey. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/	
0830-0001	Individual	Kieron	Bowker		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0831-0001	Individual	Chris	Jones		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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0832-0001	Individual	Graham	Frost		Yes	SP3	No	None of these guidance points appears to have been adhered to: The Castle Point Plan Draft should have been prepared in accordance with the Council's latest Local Development Scheme. The Castle Point Plan Draft should be accompanied by a Sustainability Appraisal and Habitat Regulations Assessment. Consultation on the Castle Point Plan Draft should have been carried out in accordance with the Council's Statement of Community Involvement. Castle Point Borough Council should have worked collaboratively with neighbouring authorities and prescribed bodies on strategic and cross boundary matters, known as the Duty to Cooperate. The Castle Point Plan Draft should comply with all relevant laws including the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012.	No	Positively prepared, Effective, Justified	Non-sustainable proposal which is imbalanced with the surrounding areas. The cart has literally been put before the horse with no infrastructure proposals to cope with the proposed demands. I'm afraid it would appear to me that our Councillors are looking somewhat amateurish and have been overwhelmed and out-manoeuvred by peers from other boroughs who are better at protecting their residents	Build a third access road towards Thurrock before anything else.	No	Not Answered	Not Answered		Infrastructure Third Road onto Canvey	Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Third Road onto Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing	N

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																		16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	

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0833-0001	Individual	Gill	Skelton		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, 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 Green Belt/Grey Belt against new NPPF guidelines. It is not justified, the site selection 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 North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery biodiversity agricultural, farming activities, nature conversation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not	Add North West Thundersley site, 187 Ha, as a Greenbelt, Greybelt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050 and Hadleigh at 305. Total housing target 11,000.	No	Not Answered	Not Answered	A	No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	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 important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It	N

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											suitable for development, but this unsound plan for 6,200 homes, puts the Hadleigh Farm site at risk to speculative development, needing planning objections with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and hope the Salvation Army agree with this direction. We need a C6 Policy for this farmland site, the South Hadleigh Green Lung , to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.														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 land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see	

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																		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, 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	

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																		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 appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is	

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																		safeguarded by policy HAD3	
0834-0001	Individual	Gary	Luckman		Yes	B9	No	Failed to consider using a section of the top/north part of the playing fields to build new community facilities in the heart of South Benfleet, such as Doctors, Dentist/NHS reach facilities, either to increase capacity of these facilities or to replace existing old sites which would be freed up for housing.	No	Justified, Consistent with national policy	Freeing up some of the playing fields may not impact significantly on available useable space, nor will it hinder the councils plans to increase Biodiversity and accessibility of the playing fields.		No	Not Answered	Not Answered	A	Allocate some of the playing fields (B9) for community facilities	Policy B9 intends for the space to be masterplanned with the support for use of the site for recreational/and or community purposes and other ancillary buildings provided as appropriate.	N

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0834-0002	Individual	Gary	Luckman		Yes	HAD2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, needing planning objections with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support		No	Not Answered		A	No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	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 important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It	N

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											this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							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 land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see	

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																		housing topic paper. 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 not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with	

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																		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, 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	

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0834-0003	Individual	Gary	Luckman		Yes	SP3	Not Answered		No t Answered		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.	1. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. 2. Utilise a section of the top of the Playing Fields (Richmond Park) for the construction of new community health facilities. 3. Utilise the land adjacent to the A130 between Sadlers Farm for affordable housing and build it into the addition of North West Thundersley site (see 1 above), together with additional access roads for housing behind Tarpots and adjoining Manor Trading Estate. Reduce the urban housing target for Canvey. Total housing target of 12,000.	No	Not Answered		A	Not meeting standard method North West Thundersley Strategic alternatives Green/Grey Belt	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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																		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,	

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																		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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																		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 not preferred. Strategic Alternatives All reasonable option sites were	

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																		considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).	
0835-0001	Individual	Dean	Isbell		Yes	SP3	No	There are much larger of areas of land that could be used to make these plans sound. Canvey Island is already over populated and over burdened by traffic and the lack of infrastructure. There are large areas of Land in the Thundersley area better suited and nearer road networks.	No	Positively prepared	Not enough investment or investigation has taken place. The committee need to assess the infrastructure of the surrounding areas and road networks not just green belt.	Move housing away from Canvey look around the new A130 area towards Thundersley and Wickford.	No	Not Answered	Not Answered		Infrastructure on Canvey North West Thundersley	Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). North West Thundersley North West Thundersley is in	N

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																		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 not preferred.	
0836-0001	Individual	Lorraine	Larman		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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0837-0001	Individual	Barbara	Burnett		Yes	HAD2	No	The plan does not appear to make provision for a reliable 5 year housing supply demand. Being based on a premise of no building on greenbelt land the plan has failed to fully consider alternative sites such as North West Thundersley.	No	Justified, Consistent with national policy	Firstly I must register my strong approval and support for Policy Had 2 within the Castle Point Plan. I agree with the premise of the plan which recognises the Hadleigh Farm area as being environmentally important; this is our heritage, and I believe that no changes should be made on these lands which would result in a significant impact on the landscape. I also agree with the principle that this Greenbelt site is not suitable for development. However, I do not believe that the overall current plan is consistent with national policy; it does not meet the Government's housing target, and thereby puts the Hadleigh Farmland site at high risk of speculative development proposals. Additionally, not all the potential sites in the area appear to have been considered; the site selection has ignored areas of mixed green and grey belt which could be utilised and therefore does not fully adhere to my understanding of the new NPPF guidelines. Further, this policy decision not to build on greenbelt land has resulted in a proposed overdevelopment of brownfield sites.	Add North West Thundersley site to the plan. This is a mix of green/grey belt land with the potential to provide 7500 houses. Doing this would relieve the pressure to build on already populated areas such as Canvey.	No	Not Answered	Not Answered	A	No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2	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 important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It	N

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																		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 land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see	

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0838-0001	Individual	TERRY	BAKER		Yes	Whole Plan	Yes		Yes	Positively prepared			No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant	Support noted.	N

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0839-0001	Individual	Dawn	Hodgson		Yes	SP3	Yes		No	Justified	The road infrastructure with not support the number of proposed of dwellings	Lower number of properties in keeping with the surroundings and more suitable for the infrastructure	Yes	Not Answered	Not Answered	A	Roads and infrastructure not able to support the housing	Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Transport The plan has been subject to detailed Transport Assessment, assessing impacts and recommending local interventions. These are identified in the Infrastructure Delivery Plan. Alongside this, the Local Transport Authority, Essex County Council, have prepared the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex includes wider local improvements to transport	N

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																		networks in and around Castle Point, including improved linkages to other areas. Growth in Castle Point will facilitate the delivery of the proposals in the Local Transport Plan 4.	
0840-0001	Individual	Carl	Hodgson		Yes	HAD4	Yes		No	Justified	Scrub lane is already a very busy road for traffic, particularly at school start and end times, it cannot cope with the additional traffic that this development would deliver		No	Not Answered	Not Answered		Objects to HAD4 due to traffic on scrub lane	Traffic 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.	N
0841-0001	Individual	David	Blackwell		Yes	Whole Plan	Yes		Yes	Positively prepared			No	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant	Support noted.	N

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0842-0001	Individual	Andrea	Wat		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, 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 towards a "no greenbelt build policy", is solely 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. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. The Had2 policy is about protecting this greenbelt site as not suitable for development, but an	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, Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered	A	No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	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 important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It	N

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0843-0001	Individual	SUSAN	SCANLAN		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, 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 towards a "no greenbelt build policy", is solely 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. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. The Had2 policy is about protecting this greenbelt site as not suitable for development, but an	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, Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered		No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	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 important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It	N

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0844-0001	Individual	JACQUELINE	DAVIS		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, 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 towards a "no greenbelt build policy", is solely 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. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. The Had2 policy is about protecting this greenbelt site as not suitable for development, but an unsound plan put's the	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 Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered	A	No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	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 important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It	N

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0845-0001	Individual	Katy	Summerhayes		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, 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. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not	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, Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered		No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	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 important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It	N

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0846-0001	Individual	Gary	Stromer		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, 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. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not	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, Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered		No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	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 important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It	N

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											suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.														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 land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see	

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																		housing topic paper. 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 not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with	

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																		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, 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	

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																		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 appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is	

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																		safeguarded by policy HAD7	
0847-0001	Individual	Sharon	Ainsley		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0848-0001	Individual	Derek	Ringier		Yes	Whole Plan	Yes		Yes	Positively prepared			No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant	Support noted.	N
0849-0001	Individual	Diane	Ellis		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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0850-0001	Individual	Ambler	Robertson		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0851-0001	Individual	Norman	Baxter		Yes	HAD4	Yes		No	Positively prepared	Already heavy traffic on a what is a narrow road especially when an incident occurs on the London Road	A much smaller number of homes in keeping with other properties in Scrub Lane especially considering number of parking spaces for families with multiple cars Take note of overspill of cars from Scrub Mews parking in Scrub Lane and causing traffic chaos	No	Not Answered	Not Answered		Objects to HAD4 due to traffic on scrub lane	Traffic 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.	N
0852-0001	Individual	Pankaj	Patel		Yes	HAD4	No	The residents views especially on Scrub Lane should have been collected. No indication of impact on local services eg schools doctors dentist etc.	No	Positively prepared, Justified	The areas objective needs infact will be made worse by the increase in traffic problems. SCRUB LANE has been used as an alternative route at peak times when A13 London Road can't cope with traffic. The Humps were introduced on Scrub Lane to slow down and reduce traffic. It worked in the beginning but increase in traffic generally has brought back the problem. The part of the road next to the land is used by parents dropping and picking up children from the Local school. You should investigate this further	To make sound take a look at views of surrounding local residents and include them on your proposal under justified.	Yes	Not Answered	Not Answered	A	Objects to HAD4 due to traffic on scrub lane and infrastructure	Traffic 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. Infrastructure Infrastructure	N

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											before proposing that the new residents will be using Scrub Lane to get to their houses. Please look at the problem between Bilton and Seymour Road after only around 14 houses were built in the Mews! Building 114 house will mean almost over 200 cars/vans and where will these park, on Scrub Lane. Where will parents park for the SCHOOL Drops and pickups?							matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
0853-0001	Individual	Jonathan	Astley		Yes	HAD4	No	I live in this area and will be adversely impacted by this proposed development and I haven't been consulted	No	Positively prepared	The area is overcrowded and there are insufficient local services such as doctors / dentists, additionally the road infrastructure is often blocked with traffic. I can see no benefit to anyone in the community by building further housing on this site.	It isn't a valid proposal therefore I believe for the benefit of the community development should not occur here.	No	Not Answered	Not Answered		Objects to HAD4 due to traffic on scrub lane and infrastructure	Traffic 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. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure	N

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																		Delivery Plan (IDP).	
0854-0001	Individual	Craig	Tipper		Yes	HAD4	Yes		No	Positively prepared, Justified, Consistent with national policy	Too many properties proposed on size of site	Reduction in number of properties	No	Not Answered	Not Answered		Density on site HAD4 too much	Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.	N
0855-0001	Individual	June	Henderson		Yes	HAD4	Yes		No	Positively prepared, Effective, Justified	[Redacted Personal Information] and already the road gets grid locked from the amount of cars parked in between junctions of Bolton and broughton Road on scrub lane. This is because of the mini estate allowed to be built between these two junctions without adequate parking. It seems the average number of cars per household is now about three. Your proposal for 114 homes is scandalous as it would see at least another 250 to 300 cars. As it is scrublane is used as a rat run thus the the sleeping policemen already built into the road. This proposal has not taken in to account all the other local issues such as impact on already over subscribed surgeries and schooling.		No	Not Answered	Not Answered		Objects to HAD4 because: Traffic Parking 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	N

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																		implemented. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
0856-0001	Individual	Not on	Patel		Yes	HAD4	No	Not enough space for traffic flow on the roads, schools, health care, etc	No	Positively prepared, Justified	There is strain on Scrub Lane at the present with traffic. Not enough space for extra schools, health care, etc. No space for stationary cars on the road plus too near environmentally to the Nature Reserve.		No	Not Answered	Not Answered		Objects to HAD4 because: Traffic Parking 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	N

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																		implemented. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
0857-0001	Individual	Neil	Burrell		Yes	HAD4	Yes		No	Effective	By adding 114 new homes existing gp provisions will be put under serious strain more so than it currently is. Plus other amenities will struggle.		No	Not Answered	Not Answered		Objecting to HAD4 due to infrastructure	Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N
0858-0001	Individual	Carole	Sullivan		Yes	SP3	No	I am not a lawyer so I don't know whether it is legally compliant. However there is no don't know choice to tick. My laypersons opinion is that it is illegal in common law to force housing on local people where the population density is already very high resulting in over busy roads and lack of services.	No	Positively prepared, Justified	Please see my answer to question 2b above.	For the plan to be sound, it must include full details on how extra housing will not result in excessive additional road traffic eg by explaining how extra roads will be built to accommodate the extra traffic. It should also explain how additional traffic will not go onto surrounding roads so that the safety of families is assured. If it fails to do this it is unreasonable to expect local people to accept it. Extra housing should not be built on Scrub Lane because	No	Not Answered	Not Answered	A	No housing due to increased traffic	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	N

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												the road will not cope with the extra traffic. Better to build upwards on the A13 or even better go back to central government via our MP to explain why we can't take as much housing as they want. They can build on large country areas such as national parks instead where traffic is very light. Finally, increased traffic for local people in Castle Point is starting to make it impossible to visit places like national parks which are inaccessible to public transport. So spread the housing across the UK more equitably, including where richer people live such as the Cotswolds.						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 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	

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																		the standard methodology requirement for housing set out in the NPPF 2025. Transport The plan has been subject to detailed Transport Assessment, assessing impacts and recommending local interventions. These are identified in the Infrastructure Delivery Plan. Alongside this, the Local Transport Authority, Essex County Council, have prepared the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex includes wider local improvements to transport networks in and around Castle Point, including improved linkages to other areas. Growth in Castle Point will	

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																		facilitate the delivery of the proposals in the Local Transport Plan 4.	
0859-0001	Individual	Debbie	Bishop-laggett		Yes	HA D4	No	114 houses is far to many for a small area. Schools and doctor's surgeries would not have capacity for extra residents. Scrub Lane would become congested with extra houses, residents. Bus route would cause massive congestion and rendering already broken speed humps (put there to make roads safer for children) unusable.	No	Effective, Justified	Would overpopulate a small area with not enough infrastructure to cope with even more residents. Any bus routes going through scrub lane would cause huge traffic congestion for existing residents to be able to reach their own properties. With an elderly contingent of residents in the area it would make it difficult for ambulances to reach people in a timely manner	A maximum of 64 houses at most and for bus routes to remain on the london road as has always been the case. Bus routes in scrub lane would be extremely detrimental	Yes	Not Answered	Not Answered		Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character	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	N

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																		implemented. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.	
0860-0001	Individual	Joan	Burrell		Yes	HAD4	No	Not enough infrastructure to cope with 114 extra houses. Traffic wise the road can be like a traffic jam if there are problems on the A13 or A127 Scrub Lane is used as a cut through. With all the extra cars more housing would bring cars will struggle to move. We need more doctors as you can't get appointments now let alone having 200 plus more people possibly needing treatment.	No	Effective	Not practical		No	Not Answered	Not Answered		Objects to HAD4 due to traffic on scrub lane and infrastructure	Traffic 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. 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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0861-0001	Individual	Rebecca	Kelly		Yes	HA D4	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	The current traffic and parking situation is already completely untenable. Cars are permanently parked along Scrub Lane creating congestion; this is exacerbated at school drop off and collection times. I have personally been involved in a car accident two months ago where the nature of the parking along Scrub Lane meant a driver took an unnecessary risk pulling onto the wrong side of the road, colliding with me and my two young children in the car. Since then; I have seen the aftermath of two further accidents on Scrub Lane alone. Similarly; parking at the end of the Conifers also creates a blind hazard for drivers turning into the road. All of this is the case as of right now; I shudder to think the extent to which this will be exacerbated by 114 new homes on the small field. Furthermore I find it incredible that the sheer volume of homes are capable of fitting onto that land. Whilst parking, traffic and congestion are the main reasons why the plans are unsound, I would also strongly query whether local services - primary schools, doctors etc - would be able to cope with the strain of the sheer volume of new people in	There needs to be far greater consideration to the traffic situation, and consideration of new roads to cope with any development. Further, there needs to be consideration of the strain on local services. Finally; there should be consideration as to the actual plans and how so many homes will fit on the small amount of land.	No	Not Answered	Not Answered		Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character	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.	N
																	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.	Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.	

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											such a small area. Finally, given how many properties it is intended to build on this land, there is absolutely no way they will be keeping with the character of this area of Hadleigh - largely detached family homes - and therefore not in keeping with the community that is established.								
0862-0001	Individual	Peter	Thomas		Yes	SP3	No	Failed to consider strategic alternatives like north west Thundersley.No credible five-year housing land supply.	No	Justified, 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, it's solely based on the "over development of Brownfield sites",has not considered all sites,with no Greenbelt/Grey Belts sites added,and the North west Thundersley site. I do totally agree with Had2 policy, for the Hadleigh Farm area,which states this site as environmental recreational nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSS1,Ramsar site, ecological restoration habitat creation and connectivity, protection as an open space, promoting the heritage site,the Castle, and whatever is planned for this site in the future does not have a significant impact on the	Add North West Thundersley site,187 Ha,as a Greenbelt, Grey Belt,Brownfield site option for7,000 homes. Reduce the urban housing target to 3,000 from 6200 with Canvey at 1050,and Hadleigh at 305. Total housings target of 11,000	No	Not Answered	Not Answered	A	No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	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	N

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											landscape or Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes puts the Hadleigh farmland site at risk to speculative development, needing planning objections with respect to the urban sprawl,its a buffer zone,the effect on the highways and traffic, lack of infrastructure protecting our farmland and wildlife out of character, open spaces,heritage,archaeolog y, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring areas of Leigh on sea.I can fully support this Had2 Policy with no housing development ever on this farmland site and hope the Salvation Army agree with this direction. We need a C6 Policy for this farmland site,the South Hadleigh Green Lung,to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on sea.													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 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	

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																		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. 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)	

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																		outlines why North West Thundersley was not preferred. 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 environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of	

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																		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 appropriate development site for those reasons set out	

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																		above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD7	
0863-0001	Individual	Peter	Watts		Yes	HAD4	No	The proposed number of 114 new homes being considered to be built, on such a small parcel of land, in an already tight and overpopulated area, is totally impractical. Please see attached, a brief snap-shot of pictures, reflecting the present and ongoing parking situation for the Conifers - which presumably, will only get worse - once the school's twice daily, drop-off/collection traffic, lose	No	Effective	Ticked this box only because a "none" box option was not offered. This area is totally unsuitable and cannot reasonably be considered to cope with the extra traffic, parking and already saturated traffic flows being experienced NOW. It is impossible to now travel along Scrub Lane - at any time of day (or night) - due to the extra parked cars along the Lane. As an example: The area around	The only necessary consideration with this site: This land should never have been proposed be built on, in the first instant.	No	Not Answered	Not Answered	B	Objecting to Had4 due to: 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	N

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								the present kirbside parking on Scrub Lane and parents look to park as close to the school as possible - which inevitably are the Greenacres and Conifers roads. Finally: the situation regarding the closure of our Doctors' Surgery in Rectory Road - “The Hollies” - is of great concern; and despite having received an email from a no-reply accurx3@nhs.net, on 21/11/2025, advising of the services available, the Surgery, it appears, is not in a position to hold in-house GP consultations, and it's not looking like they ever will - under the current circumstances, as the email states face-to-face appointments, at nearby sites ! This situation, hopefully, will be duly noted, therefore - along with the pending traffic problems - that we can’t cope now and provide services for the existing population and really, this should all be rectified, before any increase in the housing population is further considered for this area.			Scrub Mews - where there used to be one Bungalow - but now something like 12 + houses have been built - has produced parked cars from Bilton Road to Seymour Road - always a block of 9/10 vehicles on the south side of Scrub Lane - presumably the overspill of Scrub Mews residence. If you then take a moment to think of the times when Parents are dropping off/picking up young ones to the Infant school - the increased volume of traffic along Scrub Lane with the rush-hour increased volumes - pretty much grid-locks Scrub Lane and the traffic lights phasing further enhances that delay. As a long time resident [REDACTED Personal Information] ; this issue does make it more difficult to get in and out of the Conifers. In addition - and as an example - to the growing parking/congestion issue - The Conifers now has a constant amount of commercial vans and cars being parked overnight and during the day - along the west side of our street, from residents who do not live here. This makes entering the street more difficult and												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).	

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											not a great help to our excellent refuse collectors.								
0864-0001	Individual	Carrie	Apps		Yes	HAD2	Yes	X	No	Positively prepared, Effective, Justified, Consistent with national policy	I object to the proposed allocation of the HAD2 site (Hadleigh Salvation Army Land and Green Belt) for housing development in the Castle Point Local Plan (Regulation 19 Draft, July 2025). My objection is based on the following grounds, with references to the relevant sections of the Plan: 1. Inappropriate Development in the Green Belt The Plan's own Green Belt policy (Section 17, pp. 126–130, Policy GB1, paragraphs 17.1–17.12) makes it clear that development in the Green Belt is inappropriate unless “very special circumstances” exist. No such circumstances have been demonstrated for HAD2 and the Green Belt . Allocating this site would undermine the fundamental purpose of the Green Belt,	With reference to the above sections and policies of the Castle Point Local Plan Regulation 19 Draft (July 2025), I respectfully request that the allocation of HAD2 be removed from the Plan. The Council should instead focus on delivering new homes through urban and brownfield regeneration, in line with its own stated strategy and the wishes of the local community. I'd like to suggest The Blinking Owl Site (GB8) as this would be less impacting to the landscape and heritage and has better access compared to Hadleigh.	No	Not Answered	Not Answered		Objecting to built development on site HAD2	Policy HAD2 does not propose housing to be built on this site.	N

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											which is to prevent urban sprawl and protect the openness of the landscape. 2. Harm to Openness, Landscape, and Heritage HAD2 sits adjacent to Hadleigh Castle and Hadleigh Country Park—both of which are highly valued for their landscape, biodiversity, and heritage. Section 10 (Hadleigh, pp. 66–73, especially paragraphs 10.12–10.19) and Section 18 (Protecting our Biodiversity and Landscape, pp. 131–141, Policy BL1) of the Plan highlight the importance of these assets. Development here would cause irreversible harm to the openness of the Green Belt and the setting of these historic and natural features. 3. Infrastructure and Congestion Section 19 (Providing the Infrastructure Required to Support Growth, pp. 142–155, Policy INF1, paragraphs 19.1–19.14) acknowledges that Hadleigh already suffers from congestion and infrastructure constraints. Adding a large housing development at HAD2 would only make these problems worse, putting further strain on local roads, schools, and health services.								

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											4. Failure to Prioritise Brownfield and Urban Sites The Plan’s spatial strategy (Section 6, pp. 19–30, Policy SP2, paragraphs 6.10–6.18) and housing policies (Section 13, pp. 85–93, paragraphs 13.1–13.8) both commit to an “urban-first, brownfield-led” approach. Allocating HAD2 directly contradicts this strategy, as there are still brownfield and urban sites available that would cause less harm and better align with the Plan’s objectives. 5. Community Opposition and Policy Conflict Section 5 (Vision & Objectives, pp. 17–18) and the Plan’s consultation summary reflect overwhelming community opposition to the loss of Green Belt land at HAD2. Proceeding with this allocation would undermine public trust and conflict with both local and national policy priorities.								

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0865-0001	Individual	Harry	Wigley		Yes	HAD2	Yes		No	Effective, Justified	I am writing to object to the proposed allocation of the HAD2 site (Hadleigh Salvation Army Land) for housing development in the Castle Point Local Plan (Regulation 19 Draft, July 2025). My objection is based on the following grounds, with references to the relevant sections of the Plan: 1. Inappropriate Development in the Green Belt The Plan's own Green Belt policy (Section 17, pp. 126–130, Policy GB1, paragraphs 17.1–17.12) makes it clear that development in the Green Belt is inappropriate unless “very special circumstances” exist. No such circumstances have been demonstrated for HAD2. Allocating this site would undermine the fundamental purpose of the Green Belt, which is to prevent urban sprawl and protect the openness of the landscape. 2. Harm to Openness, Landscape, and Heritage HAD2 sits adjacent to Hadleigh Castle and Hadleigh Country Park—both of which are highly valued for their landscape, biodiversity, and heritage. Section 10 (Hadleigh, pp.	For these reasons, and with reference to the above sections and policies of the Castle Point Local Plan Regulation 19 Draft (July 2025), I respectfully request that the allocation of HAD2 be removed from the Plan. The Council should instead focus on delivering new homes through urban and brownfield regeneration, in line with its own stated strategy and the wishes of the local community. Once all localised developed areas are exhausted, The Blinking Owl Site formerly known as GB8 is the only viable option. Whilst it serves as nature land, it is not impacting to any landscapes, heritage and can act as a mini-town with it's own traffic routing. One large note to consider is that all other councils are needing to go through the same process. Hadleigh has only ONE road in and out that will need on the traffic of Southend Council's plans, unless you are willing to put childrens lives at risk by turning already over-used rat run roads that go past 2 primary schools (Church Road) into main roads.	No	Not Answered	Not Answered		Objecting to built development on site HAD2	Policy HAD2 does not propose housing to be built on this site.	N

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											66–73, especially paragraphs 10.12–10.19) and Section 18 (Protecting our Biodiversity and Landscape, pp. 131–141, Policy BL1) of the Plan highlight the importance of these assets. Development here would cause irreversible harm to the openness of the Green Belt and the setting of these historic and natural features. 3. Infrastructure and Congestion Section 19 (Providing the Infrastructure Required to Support Growth, pp. 142–155, Policy INF1, paragraphs 19.1–19.14) acknowledges that Hadleigh already suffers from congestion and infrastructure constraints. Adding a large housing development at HAD2 would only make these problems worse, putting further strain on local roads, schools, and health services. 4. Failure to Prioritise Brownfield and Urban Sites The Plan’s spatial strategy (Section 6, pp. 19–30, Policy SP2, paragraphs 6.10–6.18) and housing policies (Section 13, pp. 85–93, paragraphs 13.1–13.8) both commit to an “urban-first, brownfield-								

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											led” approach. Allocating HAD2 directly contradicts this strategy, as there are still brownfield and urban sites available that would cause less harm and better align with the Plan’s objectives. 5. Community Opposition and Policy Conflict Section 5 (Vision & Objectives, pp. 17–18) and the Plan’s consultation summary reflect overwhelming community opposition to the loss of Green Belt land at HAD2. Proceeding with this allocation would undermine public trust and conflict with both local and national policy priorities.									

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0866-0001	Individual	Margaret	Wigley		Yes	SP3	Yes		No	Justified, Consistent with national policy	It doesn't meet the policy required target and has not included any green or grey belt. It is biased towards an anti-build on the green belt agenda which has considered alternative sites with overdevelopment on brownfield sites especially on canvey	Consider the GB16 site as it could sustain a new village. It will help traffic and utilities already maxxed out in built up areas.	No	Not Answered	Not Answered		Not meeting housing targets Havent considered Green/Grey Belt North West Thundersley	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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																		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,	

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																		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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																		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 not preferred.	

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0867-0001	Individual	Vikki	Vafaee		Yes	SP3	No	The green belt isn't been considered for building. It's the council's policy to not build on it. So they've planned for over 3000 on Canvey Island, when they're fully aware of how awful the traffic is to get onto Canvey which backs up beyond sadlers farm affecting traffic heading to Benfleet and beyond.	No	Effective, Justified, Consistent with national policy	Refusing to consider Green belt. Unjustly proposing huge numbers on Canvey Island to protect the green belt near the councillors own homes. Some of the plan where businesses are located will never be built on. They've just used those areas to bump up the numbers for building on brownfield sites.	Spread the homes to be built fairly throughout the borough.	No	Not Answered	Not Answered		Infrastructure Transport Third Road onto Canvey	Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Transport The plan has been subject to detailed Transport Assessment, assessing impacts and recommending local interventions. These are identified in the Infrastructure Delivery Plan. Alongside this, the Local Transport Authority, Essex County Council, have prepared the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex includes wider local improvements to transport	N

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																		networks in and around Castle Point, including improved linkages to other areas. Growth in Castle Point will facilitate the delivery of the proposals in the Local Transport Plan 4. Third Road onto Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000	

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																		households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0868-0001	Individual	Susan	Ring er		Yes	Whole Plan	Yes		Yes	Positively prepared			No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant	Support noted.	N

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0869-0001	Individual	Clare	Poulsen		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0870-0001	Individual	Barbara	Marsden		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0871-0001	Individual	Raymond	Marsden		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0872-0001	Individual	James	Poulsen		Yes	Whole Plan	Yes		Yes	Positively prepared, Effective, Justified, Consistent with national policy			No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant	Support noted.	N

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0873-0001	Individual	Amber	Koyas		Yes	HAD4	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	1. Green Belt Designation The Castle Point Green Belt Landscape Assessment (2010) identifies the area south of Scrub Lane as part of the Green Belt. It describes the land as a wedge-shaped area bounded by Benfleet Creek, Canvey Way, and the railway, containing fields, scrub, and a wildlife sanctuary. The assessment notes that the area is visually degraded by infrastructure but still serves the purposes of the Green Belt. Source: https://www.placeservices.co.uk/media/56565/green-belt-landscape-assessment-castle-point.pdf 2. National Planning Policy Framework (NPPF) According to the NPPF, Green Belt boundaries should only be altered where 'exceptional circumstances' are fully evidenced and justified. The draft Castle Point Plan does not demonstrate such circumstances for the release of Green Belt land south of Scrub Lane. Source: https://consultation.castlepoint.gov.uk/planning/the-castle-point-plan-pre-submission-regulation-19/user_uploads/castle-point-plan---regulation-19-	To make the plan sound, the allocation HAD4: Land south of Scrub Lane (Page 72, Paragraph 10.31) should be deleted in its entirety. The site should not be allocated for housing because: • Its development would require release of Green Belt land without demonstrating exceptional circumstances, contrary to national policy. • Reasonable alternative sites, including brownfield and more sustainable options, are available and should be prioritised. • The site is not effective or deliverable within the plan period due to infrastructure, transport, and environmental constraints.	No	Not Answered	Yes	A	Objecting to HAD4 because: Shouldnt build on green belt land other alternative brownfield sites are available Transport Infrastructure	Policy HAD4 is not contained within the GreenBelt and therefore has been proposed. Other sites available All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). Transport The plan has been subject to detailed Transport Assessment, assessing impacts and recommending local interventions. These are identified in the Infrastructure Delivery Plan. Alongside this, the Local Transport Authority, Essex County Council, have prepared the Essex Local Transport Plan 4, which within the Implementation	N

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											draft---consultation-version---july-2025.pdf 3. Infrastructure and Transport Constraints Local residents have expressed concerns about the narrow roads on Scrub Lane, congestion during peak times, and limited public transport options. These issues suggest that the site may not be effectively deliverable within the plan period. Source: https://www.rebeccaharris.org/sites/www.rebeccaharris.org/files/2024-09/Rebecca%20Harris%20Local%20Plan%20Consultation%20Response%20AUG24.pdf 4. Flood Risk The Environment Agency's flood risk maps indicate that parts of the area south of Scrub Lane are within Flood Zones 2 and 3, meaning they are at risk of flooding. Development in these areas would need to pass the sequential and exception tests, which may not be achievable. Source: https://flood-map-for-planning.service.gov.uk/ 5. Alternative Sites The Castle Point Plan Issues and Options document lists various potential development sites, including brownfield sites and areas with fewer															Plan for South Essex includes wider local improvements to transport networks in and around Castle Point, including improved linkages to other areas. Growth in Castle Point will facilitate the delivery of the proposals in the Local Transport Plan 4. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	

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											constraints. The allocation of Green Belt land south of Scrub Lane appears to be an unnecessary choice when more suitable alternatives exist. Source: https://consultation.castlepoint.gov.uk/planning/castle-point-plan-issues-and-options/user_uploads/annex-a-1.pdf 6. Local Opposition Community groups like Save Castle Point have actively opposed the development of Green Belt land, including the site south of Scrub Lane. Their website provides a platform for residents to express concerns and objections. Source: https://www.savecastlepoint.co.uk/								
0874-0001	Individual	Neil	Sayer		Yes	HAD4	Yes		No	Effective	114 new homes to be built on this already busy area will have a profound effect on traffic, parking and under-strain services, such as schools and doctors. Scrub Lane can not in any way support this amount of new housing in such a dense concentration	At most 20 houses could reasonably be built on this piece of land	No	Not Answered	Not Answered	A	Objecting to HAD4 because: Parking Traffic Infrastructure Density	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.	N

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																		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). Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.	

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0875-0001	Individual	Lin	Heyes		Yes	SP3	No	Objection to the Draft Castle Point Local Plan for Canvey Island 1. Introduction I am writing to object to the Draft Castle Point Local Plan on the grounds that it is not legally compliant and not sound. 2. Legal Compliance The plan does not meet the requirements of the National Planning Policy Framework (NPPF) or the associated regulations because: It fails to demonstrate adequate infrastructure provision to support the proposed scale of housing development. It does not provide sufficient evidence that the plan has been positively prepared with regard to education, healthcare, transport, and emergency planning. 3. Soundness For a Local Plan to be considered sound, it must be positively prepared, justified, effective, and consistent with national	No	Consistent with national policy			No	Not Answered	Not Answered	A	Infrastructure Transport Emergency Planning Flood Risk Third Road to Canvey Hazardous and Port Related Activities	Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Transport The plan has been subject to detailed Transport Assessment, assessing impacts and recommending local interventions. These are identified in the Infrastructure Delivery Plan. Alongside this, the Local Transport Authority, Essex County Council, have prepared the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex includes wider local improvements to transport	N

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								policy. The Castle Point Plan fails in all four respects: 3.1 Infrastructure Capacity Drainage and Flood Risk: The plan does not include adequate drainage provision to mitigate the impact of new development. This raises significant concerns about flood risk and public safety. Education Provision: The recent closure of the local secondary school leaves no capacity for the additional school places required. This is contrary to the NPPF requirement for sustainable communities. Healthcare: There are already insufficient numbers of GPs and healthcare facilities. No new provision is included to meet the increased demand. 3.2 Transport and Safety The island has only one road for access and evacuation. This represents a serious risk to life in the event of flooding, a gas explosion, fire, or other emergencies. A plan that increases													networks in and around Castle Point, including improved linkages to other areas. Growth in Castle Point will facilitate the delivery of the proposals in the Local Transport Plan 4.	Emergency Planning The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/	Flood Risk The Strategic Flood Risk Assessment provides an overview of flood risk within Castle Point and then provides site specific information for the allocations in the Castle Point Plan and provides recommendations on how to address any flood risk arising through

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								population without addressing this fundamental issue cannot be considered safe, effective, or sustainable. 4. Conclusion The Draft Castle Point Local Plan is unsound and not legally compliant because it fails to provide for adequate infrastructure, drainage, education, healthcare, and emergency access. It does not comply with the NPPF or ensure the safety and wellbeing of residents. I therefore formally object to the plan in its current form.													development. Third Road to Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local	

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																		Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan. Hazardous 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	

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																		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 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	

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																		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 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.	

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																		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’.	

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0876-0001	Individual	Andrew	McDonald		Yes	HAD4	Yes		No	Effective, Justified	The plan does not meet the needs of the local residents, and is purely an academic exercise in how many properties can be placed on an individual site. The proposal for 114 new homes in Scrub Lane takes no account for the impact on local schools or local medical facilities. Such level of development will mean an additional 230 to 250 people in this area. Additionally no impact on the serious road congestion 200 plus vehicles will have. At peak times the road is almost grid locked any additional vehicles will only deteriorate the situation. Has an emergency services impact statement been arranged between 8.30 and 9.00 on weekdays?	More consultation with local residents needs. Perhaps a questionnaire to everyone living in the borough.	No	Not Answered	Not Answered		Objecting to HAD4 because: Traffic Parking Infrastructure Density Emergency Services impact 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).	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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																		Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details. Emergency Services Impact Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	
0877-0001	Individual	Patricia	McDonald		Yes	HAD4	Yes		No	Effective, Justified	Concerns regarding increased road traffic. Additional concerns regarding impact on local schools and medical facilities. Plus serious loss of green spaces.	More focused needs on the requirements of residents.	No	Not Answered	Not Answered	A	Objecting to HAD4 because: Traffic Infrastructure Loss of Green Space	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. Infrastructure Infrastructure matters	N

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																		(including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Loss of Green Space This is a private piece of land with no public access or rights of way across it.	

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0878-0001	Individual	Sarah	Howard		Yes	SP3	No	I do not believe the Castle Point Plan Draft is legally compliant for several important reasons, which I share as someone who has lived on Canvey Island for many years. - Lack of meaningful community engagement: From what I have seen, residents were not properly involved in the process. Major changes such as proposals to redevelop our health centres, police station, fire station, and libraries were not clearly explained to the public. For people of my age, these facilities are essential daily lifelines, and losing them without clear consultation goes against the Council's own rules on involving the community. - Duty to Cooperate not fulfilled: It is not clear that the Council has worked effectively with Essex County Council, the Environment Agency, or neighbouring local authorities. Issues such as flood defences, drainage, and the desperately needed third road off the Island cannot be handled in isolation. Without strong cooperation, the Plan cannot be legally compliant. - Flood risk and drainage problems: Canvey Island is unique. We sit below sea	No	Positively prepared, Effective, Justified, Consistent with national policy	From my perspective as a long-term resident, the Plan is not sound for these reasons: - Not Positively Prepared: Too many houses are planned for Canvey without the basic infrastructure to support them. We have waited decades for a third road, yet it is still missing. Even today, ambulances and fire engines often get stuck in traffic. Adding more housing without solving this first puts lives in danger. - Not Justified: The Council seems to be prioritising housing numbers over common sense. They are proposing to redevelop vital community facilities like our health centres, police station, and library. For many older residents, these are the places we rely on the most. Taking them away without proper replacements is unfair and short-sighted. - Not Effective: There is no clear evidence that many of these sites can even be built. We are told there is no proof of landowner agreements or funding. The third access road is always delayed. Without these, the Plan is not deliverable. - Not Consistent with National Policy: The Plan allows homes in flood zones without proper protections, which goes	To make the Plan workable and safe for us, the following changes are needed: 1. A third road for Canvey (Policies IN1, SP1): No more large housing developments should be approved until a third access road is built and funded. 2. Protect community facilities (Policies HO1, SP1): Do not redevelop our fire station, health centres, library, or police station without guaranteed replacements. Older people especially depend on these services. 3. Flood and drainage protection (Policy CC1): Require proper flood and drainage studies before building. Systems like soakaways or infiltration trenches do not work here because of the tides, high groundwater, and reliance on pumps. Only drainage solutions proven to be safe for Canvey should be allowed. 4. Housing delivery (Policy HO1, Appendix A): Reduce the overall plan period and housing numbers so infrastructure can keep up. New homes should only be built after improvements to roads, schools, and health services are in place. 5. Cooperation (Policy IM1): Show clear agreements with Essex County Council, the NHS, and others to deliver	No	Not Answered	Not Answered		Lack of meaningful engagement Duty to cooperate not met Flood Risk on Canvey LDS changes Deliverability Third road to Canvey Loss of Community Facilities	Lack of meaningful engagement Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement. Duty to Cooperate Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. The Council has worked collaboratively with all to ensure that the Duty to Cooperate has been met. Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially	N

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								level, rely on pumps to stay dry, and experience high groundwater and tidal conditions. I have personally seen the flooding here and know that systems like soakaways, infiltration trenches or permeable paving will not work on this Island. They could even make flooding or contamination worse. Any drainage solution must be compatible with Canvey's pumped system, or it will put people at risk. I do not believe the Plan reflects these realities. - Unclear timetable: The Local Development Scheme has been changed several times, making it hard to see if the Council is following the proper legal process. - Deliverability: Some of the proposed sites have no clear landowner support. Including such sites misleads residents and does not meet the legal requirement to show the Plan can actually be delivered.			against national rules for safe and sustainable development. It also proposes taking away important services we need for daily life, which contradicts national policy on supporting strong communities.	roads, drainage, health, and education infrastructure. 6. Revised wording (Policy SP1): No development on Canvey should go ahead unless safe access, flood protection, and services are proven to be in place and deliverable within the Plan period.						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 and IDP, including in relation to Canvey. LDS Changes In order to be thorough in producing a robust evidence	

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																		bases unfortunately the council has experienced some delays which has effected the timetable. The council has endeavoured to update the LDS whenever a delay became apparent to maintain transparency. Deliverability All sites included within the plan were submitted by the landowner due to call for sites and/or is owned by the council. Third Road to Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter	

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																		which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a	

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																		contribution to relevant transport improvement projects identified in the Local Transport Plan. Loss of Community Facilities Policy INFRA1 states that redevelopment of existing community uses will only be supported if: a. The utility and function of the community use is improved; b. The community use is located in the same, or a more sustainable location; c. The site makes the best use of urban land in the Borough	

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0879-0001	Individual	Douglas	Howard		Yes	SP3	No	The Castle Point Plan Draft is not legally compliant for these reasons: - Lack of community engagement: The consultation fell short of the Council's own Statement of Community Involvement. Residents were not properly informed about proposals affecting health centres, libraries, and emergency services. That level of consultation does not meet legal standards. - Duty to Cooperate: The Draft Plan fails to demonstrate meaningful collaboration with Essex County Council, the Environment Agency, and neighbouring councils. Issues like a third access road, flood defences, and drainage cannot be addressed by Castle Point in isolation. - Flood risk inadequately addressed: The Plan does not account for Canvey's unique conditions—low elevation, high groundwater, tidal influence, and reliance on pumps. Infiltration-based SuDS (soakaways, trenches, permeable paving) are unsafe here. Without drainage solutions linked to the pumped network, the Plan does not meet legal compliance. - Local Development	No	Positively prepared, Effective, Justified, Consistent with national policy	The Draft Plan is not sound for these reasons: - Not Positively Prepared: It proposes significant housing growth on Canvey without providing the critical infrastructure needed, particularly a third access road. The Island's transport system is already overstretched. - Not Justified: Proposals target community infrastructure sites such as health centres, fire and police stations, and libraries. These are essential, and the Plan does not justify removing them or show why better alternatives weren't considered. - Not Effective: There is no evidence of landowner commitment or infrastructure funding. Without these, sites are not deliverable. The third road remains unresolved, making the Plan ineffective. - Not Consistent with National Policy: Building in flood-prone areas like Canvey without robust mitigation contradicts the NPPF. Removing vital community services also conflicts with national policy on supporting healthy, resilient communities.	The following changes are required: 1. Third access road (Policies IN1, SP1): No further major development should be allowed until a third access road to Canvey is fully funded and delivered. 2. Protect facilities (Policies HO1, SP1): Do not redevelop fire, health, library, or police facilities unless like-for-like replacements are secured. 3. Flood resilience (Policy CC1): All development must be supported by site-specific flood risk and drainage assessments. Infiltration-based SuDS are unsuitable for Canvey. Only pumped or mechanical systems that work with the Island's drainage should be approved. 4. Housing delivery (Policy HO1, Appendix A): Shorten the plan period and reduce housing numbers to realistic levels. Phase delivery so homes are only built once supporting infrastructure is in place. 5. Cooperation (Policy IM1): Provide an updated Statement of Common Ground with Essex County Council, the NHS, and others, showing clear commitments for transport, drainage, education, and health. 6. Revised wording (Policy SP1): Development on Canvey must not proceed	No	Not Answered	Not Answered		Lack of meaningful engagement Duty to cooperate not met Flood Risk on Canvey LDS changes Deliverability Third road to Canvey Loss of Community Facilities	Lack of meaningful engagement Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement. Duty to Cooperate Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. The Council has worked collaboratively with all to ensure that the Duty to Cooperate has been met. Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially	N

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								Scheme: The timetable has been changed several times, raising concerns about whether the statutory process is being followed correctly. - Deliverability: Some housing sites have no confirmed landowner support or evidence of delivery. Including undeliverable sites undermines the legal requirement to present a realistic Plan.				without confirmed emergency access, flood defences, and infrastructure in place within the Plan period.						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 and IDP, including in relation to Canvey. LDS Changes In order to be thorough in producing a robust evidence	

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																		contribution to relevant transport improvement projects identified in the Local Transport Plan. Loss of Community Facilities Policy INFRA1 states that redevelopment of existing community uses will only be supported if: a. The utility and function of the community use is improved; b. The community use is located in the same, or a more sustainable location; c. The site makes the best use of urban land in the Borough	
0880-0001	Unable to process due to lack of contact details provided.																		

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0881-0001	Individual	Ann	Mitchell		Yes	SP3	No	Legally compliant or not, Canvey Island's infrastructure is unable to cope with the proposed new builds.	No	Effective	How is Canvey supposed to cope with all the new housing when we are already over populated? Drainage and access on and off the Island is already stretched.	Sound drainage and infrastructure and another road off the Island are vital.	No	Not Answered	Not Answered	A	Flood Risk on Canvey Infrastructure Third Road on Canvey	Flood Risk 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 and IDP, including in	N

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																		The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	

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0882-0001	Individual	Tracy	Simon		Yes	SP3	No	The Castle Point Plan Draft does not appear to be legally compliant for several reasons: Lack of meaningful community engagement. The plan was not prepared in a manner that aligns with the councils own statement of community involvement. Residents have not been properly consulted on critical aspects such as infrastructure capacity, site delivery and the impact of local services.proposals to redevelop essential community assests, or health centres, police station, fire station and library. Duty to cooperate not demonstrably fulfilled. The plan shows sufficient evidence that Castle Point Borough Council has worked collaboratively with Essex County Council, the Environment Agency and neighbouring authorities,especially shared infrastructure, flood risk, mitigation and strategic transport such as a third road. Inadequate consideration of flood risk and environmental constraints. Although the plan is accompanied by a	No	Positively prepared, Effective, Justified, Consistent with national policy	Not positively prepared. The plan proposes significant housing growth across Castle Point, particularly Canvey Island, without delivering the critical infrastructure required to support it. The absence of third access road to Canvey Island undermines the plans ability to meet the areas need for sustainably or safety. Infrastructure and transport already under significant strain and no realistic solutions included in the dtaft.Not justified, the strategy appears to.prioritise housing numbers over deliverability, safety and sustainability. Brownfield sites proposed for redevelopment including vital community infrastructure. Including, health centres, police.and fire station and linary.the plan lacks a clear explanation as to why these were chosen over more sustainable or deliverable alternatives, such as owed density development of infrastructure, first approaches were adequately considered or consulted on. Not justified. The strategy appears to priorities housing over deliverability, safety and sustainability. Brownfield sites proposed	To make the Castle Point Plan Draft legally compliant and sound, the following modifications should be made. 1) infrastructure delivery and access. Policy INI, SP1 Reinroduce and prioritise the creation of a third access road to Canvey as a strategic infrastructure objective within the plan period. Reinstate atteNdance West access taskforce to ensure proper delivery oversight and consultation with Essex County Council and the Environment Agency. Explicitly state that no further major residential development until this access is secured and funded. 2) site allocations and community facilities (policies HO1 andsSP1) Remove or revise proposals to redevelop key community infrastructure is coffeehouse stations, health centres, library and town centre cardboard listed as brownfield without a clearly identified replacement strategy. Ensure the retention and modernisation of essential community infrastructure is included in the plan as a priority, particularly in underserved or isolated areas such as Canvey Island.	No	Not Answered	Not Answered	A	Lack of meaningful engagement Duty to cooperate not met Flood Risk on Canvey LDS changes Deliverability Third road to Canvey Loss of Community Facilities	Lack of meaningful engagement Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement. Duty to Cooperate Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. The Council has worked collaboratively with all to ensure that the Duty to Cooperate has been met. Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially	N

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								sustainability appraisal, it does not adequately address the environmental consequences of building on Canvey Island, a known flood prone area. Unclear alignment. With local development scheme. The council own timetable and approach outlined in the local development scheme have shifted repeatedly, rising concerns about whether the statutory process and timeline have been properly followed. Failure to demonstrate deliverability. The sites have been included in the draft without evidence in the draft without evidence of deliverability or landowner commitment.. This may mislead residents and does not meet the requirements to present a plan that can be realistically implemented within the identified timeframe.			for redevelopment include vital community services. The plan lacks a clear explanation as to why these sites were chosen over more sustainable or deliverable alternatives. Moreover there is no clear evidence that alternative strategies, such as lower-density development of infrastructure -first approaches,v were adequately considered or consulted on. Not effective. Many sites included in this plan are not demonstrably deliverable. Rebecca Harris NO Anglican stakeholders have pointed out that there is no clear evidence of landowner commitment, infrastructure funding or timeline to bring sites forward.this undermines The plans effectiveness over the plan period. Not consistent with national policy.The plan does not enable genuinely sustainable development as set out in the National Planning Policy Frames (NPPF) Proposals to build on high flood risk ares, particularly Canvey Island, without adequate mitigation infrastructure or investment in drainage infrastructure directly contradicting NPPF	3) flood risk and climate resilience (policy CC1) Require a full site specific flood risk and drainage assessment for all proposed sites on Cancer Island and other flood prone areas before planning permission is granted. Flood risk must be demonstrably reduced and not just managed, through mitigation measures, including sea defences and sustainable urban drainage systems. 4) housing delivery (policy HO1, appendix A) Reduce the plan period from 20 to 15 years to avoid unnecessary overestimation of housing need and reduce strain on infrastructure. Remove sites from housing trajectory that lack evidence of landowner commitment or deliverable within the plan period. Include a phased approach to housing delivery tied to infrastructure improvement s ensuring development is not front loaded before roads, schools and healthcare capacity are increased. 5) Cross-boundary cooperation and evidence base (policy IM1) Provide an updated and transparent statement of common ground showing joint work with Essex County						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 and IDP, including in relation to Canvey. LDS Changes In order to be thorough in producing a robust evidence	

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											principles. In addition the proposed loss of valued community facilities (library, healthcare and public services) runs counter to national policy on community cohesion, resilience and accessibility.	Council, NHS bodies, utility providers and neighbouring authorities. Including clear timelines, funding plans and inconsiderate for all critical infrastructure, transport, education and health reference in the infrastructure delivery plan. 6) Revised wording (suggested) Current policy SP1 - spatial strategy. "Development on Cancer Island will only be supported where it is demonstrated that adequate emergency access, flood risk mitigation and supplying infrastructure are in place and deliverable within the plan period. Strategic development shall not proceed in areas with a single access route unless a secondary access is secured).						bases unfortunately the council has experienced some delays which has effected the timetable. The council has endeavoured to update the LDS whenever a delay became apparent to maintain transparency. Deliverability All sites included within the plan were submitted by the landowner due to call for sites and/or is owned by the council. Third Road to Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter	

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																		which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a	

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																		contribution to relevant transport improvement projects identified in the Local Transport Plan. Loss of Community Facilities Policy INFRA1 states that redevelopment of existing community uses will only be supported if: a. The utility and function of the community use is improved; b. The community use is located in the same, or a more sustainable location; c. The site makes the best use of urban land in the Borough	
0883-0001	Individual	Claire	Dowd		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0884-0001	Individual	Hanna	Stevens		Yes	SP3	Yes		No	Positively prepared, Justified	The support and infrastructure such as health services, education and childcare provision and	Infrastructure changes to be implemented and all of the services above improved and expanded prior to any	No	Not Answered	Not Answered		Lack of Infrastructure	Infrastructure matters (including healthcare and	N

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											other local and social services are insufficient in the borough to meet the needs of this additional number of new properties. The roads are also insufficient to provide safe access to this site. There needs to be significant investment in the local area prior to considering the expansion of housing. The local main hospital is already struggling to meet the demands of the population coming last as an acute Trust and voted worst large hospital in the country.	new build being considered within the Castle Point Borough.						education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
0885-0001	Individual	Jay	Edwards		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0886-0001	Individual	Steve	Hulbert		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0887-0001	Individual	Kevin	Gosling		Yes	HAD4	No		No	Positively prepared	Traffic, and the amount of homes on the site at scrub lane	Less houses, 114 new homes on this site.. is too large For the area.. Traffic will be impossible	No	Not Answered	Not Answered	A	Objecting to HAD4: Traffic Density	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	N

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																		comply with T5 to ensure sufficient highway impact mitigation. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.	
0888-0001	Individual	James	Taylor		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0889-0002	Individual	Lara	Lawson		Yes	Infra6	Not Answered		Not Answered		I would like to add that these ICNIRP 'Safety' Certificates have been also been self certified. I would like to add that the International Commission of Non Ionizing Radiation Safety Guidelines in 2020 do state that they do not cover the public who have with metal implants. Also as with the safety certificates for Cell Towers with a Limited Company Name that is not registered there are also Applications for the infrastructure to the Council with Limited Company Names that are		Not Answered	Not Answered	Yes - See attachments	None	Objecting to INFRA6: Concerned due to exposure of non ionizing radiation reduction in house prices	ICNIRP Referring to the International Commission on Non-ionizing Radiation is best practice and ensures the applications submitted are regulated under this body. Further to this policy INFRA 6 requires a risk assessment to be submitted which will ensure all protected groups are taken	N

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											also not registered at Companies House. For future planning and implementation of this type of infrastructure we need more due diligence to protect the residents from long term exposure to non ionizing radiation. There are also many other concerns with regards to this infrastructure, reduction in property prices to the surrounding houses. We ask that these concerns be taken into account when introducing any more of this infrastructure to residential areas.							care of. Reduction in house prices This is not a material planning consideration.	

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0889-0001	Individual	Lara	Lawson		Yes	Infr a6	Not Answered		No Answered		With regards to wireless infrastructure due to my findings that I am concerned with regards to safety of wireless infrastructure and ask Councils and Castle Point Council to ensure health protective policies for telecommunications infrastructure. There is evidence now that there are carcinogenic risks from RF radiation. There are many emerging studies that warrant health and safety to be taken into consideration. Health Risks of Wireless Radiation for Children, Elderly & Vulnerable Groups Dr. Erica Mallery-Blythe – Radiation Research Lennart Hardell, MD, Ph.D – Radiation Research I live in [REDACTED] and there have had a number of cell towers implemented in the surrounding residential area near to my property which has been a concern for residents. I would like to report further to my research of the last three years with regards to Cell Towers that have been erected in the		No	Not Answered	Yes - See attachments	B - see 0889-0002 and additional supporting evidence	Objecting to INFRA6: Concerned due to the use of ICNIRP	ICNIRP Referring to the International Commission on Non-ionising Radiation is best practice and ensures the applications submitted are regulated under this body.	N

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											local area that the current ICNIRP 'International Commission of Non Ionising Radiation' Safety Certificates for a number of these towers have a discrepancy. They have been issued with a Ltd Company Name that was Dissolved in 2015. There are also many other concerns with regards to this infrastructure, reduction in property prices to the surrounding houses. We ask that these concerns be taken into account when introducing any more of this infrastructure to residential areas. Please consider the following: A review the of masts with applications and safety certificates that have Limited Company Names that are either dissolved or not registered at Companies House. That these towers are setback at least 500 metres from homes and further back from schools and hospitals including care homes. Implementation and										

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											testing and constant monitoring of infrastructure to uphold fire and radiation safety standards. Ensure that the safety certificates are issued by an independent expert and not self certified going forward. References: Ian Jarvis – Three UK Ltd brief update, Jan 2025: https://ianjarvis.co.uk/wp-content/uploads/2025/01/25-01-24-Three-UK-Ltd-Brief-update.pdf 3. Radiation Research Trust – Three UK Limited report: ICNIRP Certificates issued in the name of ‘Three UK Limited’ dissolved in 2015 – Radiation Research								
0890-0001	Individual	Shelley	Neill		Yes	SP3	No		No	Effective, Justified	Canvey Island does not have the relevant transport links or infrastructure to allow for the plan. Whoever planned this has never sat in the traffic on a daily basis or seen the effect even minor roadworks or an accident can cause on Canvey and all surrounding areas. How is it justified that Canvey would be having the vast majority of		No	Not Answered	Not Answered		Transport Infrastructure	Transport The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access	N

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											new homes built in it. It is already overpopulated with very little in the way of shopping facilities, schools, health facilities.							improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand comes from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the	

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																		development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
0891-0001	Individual	Stacey	Dixon		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0892-0001	Individual	Theresa	Merlane		Yes	Whole Plan	No		No				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is not legally compliant	Comment noted.	N

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0893-0001	Individual	Lee	Glascock		Yes	HAD4	Yes		No	Positively prepared, Effective, Justified	Dear Sir/Madam, I am writing to register my strong objection to the proposed development of 114 new homes on Scrub Lane, adjacent to the local primary school. While I understand the need for housing, this particular proposal will create significant and lasting problems for both residents and the wider community. Traffic & Safety Concerns Scrub Lane is already used heavily as a cut-through from the A13 to Southend. At peak hours, traffic volumes are severe, and access to and from private driveways is extremely difficult. In my own experience, it is not uncommon for 10–20 cars to pass before there is an opportunity to exit the driveway safely. When there are delays or roadworks on the A13, congestion worsens to the point where traffic is bumper-to-bumper. Introducing 114 additional homes, many of which will have multiple car-owning households, will inevitably create gridlock. By conservative estimates, this could mean several hundred additional vehicles trying to access Scrub Lane		No	Not Answered	Not Answered	A	Objecting to HAD4 because: Traffic Parking Infrastructure Density	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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											daily, intensifying congestion, increasing air pollution, and raising the risk of accidents. The proposed access point via Scrub Lane is entirely unsuitable for such a volume of traffic. The volume already means that even a few parked cars currently cause severe obstructions and tailbacks. Scaling this up to account for hundreds of extra vehicles is simply unmanageable. Proximity to Primary School Locating new housing, including units for residents with complex needs, immediately beside a primary school raises serious safeguarding questions. While the definition of "complex needs" is broad, the placement of such accommodation next to a site where young children gather every day is not a wise or safe choice. At the very least, this requires much greater scrutiny before approval could even be considered. Pressure on Local Infrastructure Local services are already under immense strain. The primary school, which is small, will struggle to cope								Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.	

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											with the inevitable increase in pupil numbers, leading to overcrowded classrooms and reduced educational quality. The local GP surgery, situated at the end of Scrub Lane, is already oversubscribed. Personally, I have had to go without appointments despite living with chronic health conditions, simply because i cannot get through on the phone or get an actual appointment when i need it. Adding hundreds of new residents will make it virtually impossible for current patients to receive timely care. This is not only a local inconvenience but a serious public health issue. Local shopping facilities (Morrisons, Lidl, and others) are already stretched. Parking is difficult in peak times, and with several hundred new residents across Benfleet, Thundersley proposals and now this, demand will far exceed supply. This overdevelopment risks eroding the quality of life for everyone in the area. The road of scrub lane and surrounding area has always been considered as a peaceful and attractive area, with woodland and									

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											walks that bring in many visitors. It seems all that's happening is we are constantly cramming housing into the area (scrub lane mews and now this). When will it stop ? When the natural beauty of the area is gone? Cumulative Impact It is vital to consider this proposal in the wider context of ongoing development in Castle Point. The cumulative effect of large-scale building projects is leaving residents feeling cramped in, with infrastructure lagging far behind housing expansion. Roads, schools, healthcare, and local services are already inadequate. Adding this development will simply worsen every existing problem. Conclusion This application is wholly inappropriate for Scrub Lane. The severe traffic problems, risks to child safety, overstretched healthcare and education services, and the cumulative overdevelopment of Castle Point make this proposal unsustainable. I urge the Council to reject this application and instead seek alternative, more suitable sites that do not								

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											jeopardise the wellbeing of existing residents and the safety of our children.								

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0894-0001	Individual	Emma	Noakes		Yes	SP3	No	The plan doesn't consider other alternatives like North West Thundersley.	No	Justified, 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. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this	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 Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered		No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	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 important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It	N

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											Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, needing planning objections with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.								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 land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see	

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																		housing topic paper. 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 not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with	

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																		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, 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	

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																		safeguarded by policy HAD6	
0895-0001	Individual	Scott	Jones		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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0896-0001	Individual	Janet	Chambrlain		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, 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. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this	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 Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered		No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	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 important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It	N

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											Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, needing planning objections with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.														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 land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see	

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																		housing topic paper. 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 not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with	

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0897-0001	Individual	Lisa	Chandler		Yes	Whole Plan	No	Don't want more houses built unless they put in another road	No				No	Not Answered	Not Answered		Third Road onto Canvey	The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed	N

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																		through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant	

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																		transport improvement projects identified in the Local Transport Plan.	
0897-0002	Individual	Lisa	Chandler		Yes	Whole Plan	No		No	Consistent with national policy		No more houses	No	Not Answered			No more houses	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	N

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																		as a whole, to deliver this scale of growth in 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.	
0898-0001	Individual	Ric hard	Frak e		Yes	HA D4	No	This plan does not consider local traffic and parking which already straining heavily on local traffic. What with the school, ,many using Scrub Lane a cut through to avoid congestion on the London Road. With another 114 homes this will only make to situation impossible to a point of gridlock. As a resident of Conifers it is bad enough already	No	Positively prepared, Effective, Justified	This plan does not consider local infrastructure, traffic and parking which already straining heavily. What with the school, many using Scrub Lane a cut through to avoid congestion on the London Road. With another 114 homes this will only make to situation impossible to a point of gridlock. As a resident of Conifers it is bad enough already .This also fails to consider strain on local serviced The Hollies	Lack of consideration of the effect on local amenities (Schools, Doctors & Dentists), traffic and parking	No	Not Answered	Not Answered		Objecting to HAD4: Traffic 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	N

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											Doctors Surgery is already impossible to get an appointment, an another 114 home will only increase that burden.							highway impact mitigation. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
0899-0001	Individual	Sean	Gough		Yes	SP3	No	Failed to consider strategic alternatives such as North West Thundersley. No credible five-year housing land supply.	No	Justified, 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. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature	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 Hadleigh at 305. Total housing target of 11,000	No	Not Answered	Not Answered	A	No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	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	N

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											conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, needing planning objections with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a								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 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	

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											strategic green infrastructure asset between Hadleigh and Leigh on Sea.							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. 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	

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																		transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. 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 environment in Castle Point,	

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																		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	

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																		mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	
0900-0001	Individual	STEVE	BERY		Yes	HAD4	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	First of all, can I just say that 3b is not the sort of question you ask local residents, many of them elderly and not very computer-literate. Those who have compiled the local plan are not personally invested in the suggested development of this plot so they may consider the proposal and the overall plan as positively prepared, effective, justified and consistent with national planning policy. We, as	Not for us to do. There is consideration of the existing neighbours, the impact on the current infrastructure, the knock-on effect of significant traffic jams, etc etc. The only change I wish to insist upon is the removal of the number 114 and its replacement by the number 14.	No	Not Answered	Not Answered	A	Objecting to HAD4 because: Traffic Parking Infrastructure Density	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	N

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											residents, are looking at this from the perspective of how it impacts our everyday lives.....and it is hugely personal to all of us. This proposed development does not take into account the existing neighbourhood's needs which are falling short in so many ways and have been for some time. The doctor's surgery in Rectory Road is already understaffed and swamped with patients that it is difficult to get an appointment at short notice and non-urgent appointments can take weeks. The traffic issues in Scrub Lane are notoriously bad (partly down to school parking twice a day but also due to Scrub Lane Mews that was a poorly thought-out planning approval!) and whenever there is a problem on the A127 or A13 then Scrub Lane is always the rat-run that leads to local gridlock. 114 residences is a ridiculous number of dwellings to dump on this site. It is in no way consistent with the type of housing currently on Scrub Lane. Indeed, 14 houses is probably the sort of size of homes that this plot could accommodate. 114 dwellings would likely add a minimum of 114 cars exiting on to Scrub Lane. There are no multi-storey							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). Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.	

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											buildings currently in the vicinity and I cannot see any other way of providing 114 homes with 114 parking spaces on such a small plot. There does not yet seem to be any information about adding to the infrastructure with doctors surgery, additional school places etc and these, as mentioned above, are already over-run with applicants/patients from the existing neighbourhood. In short, you are trying to compensate the inadequacy and failure of countless councils in order to appease Central Government demands for more housing. Our neighbourhood is already overrun with over-development and this is massive overkill on a small plot. I therefore wish to add my objections to the argument against this proposed development. It is not going to mirror the current housing that faces the plot opposite, it will cause a significant deterioration in traffic along Scrub Lane, particularly if parking spills onto Scrub Lane as is the case with the awful Scrub Lane Mews bottleneck. The schools will be overrun with demand for places more so than ever and so too the doctor's surgery, The Hollies.								

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											If there has to be development on this land then make it match the existing neighbourhood as your Planning Officers are instructed to ensure, but I challenge any architect to come up with such a design which includes 114 properties on this small plot and which complies with that regulation.								
0988-0006	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	GB1	No		No	Positively prepared, Effective, Justified, Consistent with national policy	6.1. Criterion 1 is currently not consistent with the NPPF. It is not the case, as implied by the current wording of the policy, that development on Green Belt land is only possible if allocated by a development plan. NPPF paragraphs 154 and 155 set out the exceptions where development is not regarded as being inappropriate in the Green Belt, and paragraph 153 establishes that inappropriate development can be approved where Very Special Circumstances exist.	6.2. Criterion 1 should be amended as follows: 6.3. Development proposals within the Green Belt, as defined on the Policies Map, will assessed in accordance with the relevant NPPF provisions. 6.4. The consistency of Policy GB2 (relating to previously developed land) with the NPPF also needs to be considered by the Council.	Yes	Not Answered	Yes	A	Is of the view that it is not consistent with the NPPF	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	N

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																		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. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be	

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																		Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. 2018 Green Belt Assessments still form part of the evidence and considered wider areas.	
0902-0001	Individual	Arne	Carlson		Yes	HAD4	Yes		Yes			With regard to HAD4, this land cannot support the proposed 114 homes. Ideally I would prefer this to be developed as playing fields but if it has to be developed, it should be in keeping with the remainder of Scrub Lane. There are only 10/11 houses opposite this site and 2 down each side. A policy of in-keeping should consider no more than 30 homes. How 114 homes will fit with adequate parking of at least 2 spaces is incomprehensible. The development of Scrub Lane Mews shows how a cramped design has negatively impacted the area and 114 homes would be a huge mistake and a quota of 30 homes would be more reasonable. The reason for this is as follows: -It will be sympathetic to the	No	Not Answered	Not Answered	A	Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character Air quality	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	N

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												existing homes layout -Scrub Lane traffic and parking is getting worse each week. The building of Scrub Lane Mews has caused so many parking issues which ECC will do nothing about despite issues being raised around dangers to school children, road rage and the fact that Scrub Lane is often used as a cut through when the A13 is obstructed and on many occasions, you cannot move down the road due to congestion -The local doctor and dentist surgeries cannot cope with the current population of this area -The utilities are always failing particularly the water pipework -It will be safer for pupils attending both of the Hadleigh schools -Our own road - Woodland Close, has over 17 'track it ' issues with ECC which have not been attended to and to neglect existing residents over new development is a real failing of Essex overall, irrespective of what falls under ECC or CPBC. - There will be significant increase in levels of pollution both with the building work and the additional homes. - 30 homes would offer a greater chance of green space and planting as opposed to the 'concrete						implemented. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details. Air Quality Air quality impacts are assessed in the Sustainability Appraisal, under objective 9.1. Annual Status Reports for Castle Point can be found on the Essex Air website along with further information relating to air quality within Castle Point. Castle Point monitor nitrogen dioxide using diffusion tubes at 30 monitoring locations around the district. The main source of pollution in the Borough is road traffic emissions from major roads, notably	

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												over ' method which is counter to the vision and objectives and the information on page 24 /6.27						the A13, A127 and A130. The Council has not declared any Air Quality Management Areas (AQMAs). Generally, air pollution is low in Castle Point. Results from the monitoring points across the Borough suggest that air quality is improving.	
0903-0001	Individual	Nicola	Carlson		Yes	HAD4	Yes		Yes			With regard to HAD4, this land cannot support the proposed 114 homes. Ideally I would prefer this to be developed as playing fields but if it has to be developed, it should be in keeping with the remainder of Scrub Lane. There are only 10/11 houses opposite this site and 2 down each side. A policy of in-keeping should consider no more than 30 homes. How 114 homes will fit with adequate parking of at least 2 spaces is incomprehensible. The development of Scrub Lane Mews shows how a cramped design has negatively impacted the area and 114 homes would be a huge mistake and a quota of 30 homes would be more reasonable.	Not Answered	Not Answered	Not Answered	A	Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character Air quality	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	N

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												The reason for this is as follows: -It will be sympathetic to the existing homes layout -Scrub Lane traffic and parking is getting worse each week. The building of Scrub Lane Mews has caused so many parking issues which ECC will do nothing about despite issues being raised around dangers to school children, road rage and the fact that Scrub Lane is often used as a cut through when the A13 is obstructed and on many occasions, you cannot move down the road due to congestion -The local doctor and dentist surgeries cannot cope with the current population of this area -The utilities are always failing particularly the water pipework -It will be safer for pupils attending both of the Hadleigh schools -Our own road - Woodland Close, has over 17 'track it ' issues with ECC which have not been attended to and to neglect existing residents over new development is a real failing of Essex overall, irrespective of what falls under ECC or CPBC. - There will be significant increase in levels of pollution both with the building work and the additional homes. - 30 homes would offer a						Guidance (Part 1 and 2) to be implemented. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details. Air Quality Air quality impacts are assessed in the Sustainability Appraisal, under objective 9.1. Annual Status Reports for Castle Point can be found on the Essex Air website along with further information relating to air quality within Castle Point. Castle Point monitor nitrogen dioxide using diffusion tubes at 30 monitoring locations around the district. The main source of pollution in the Borough is road traffic emissions	

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												greater chance of green space and planting as opposed to the 'concrete over ' method which is counter to the vision and objectives and the information on page 24 /6.27 -the proposal to add cycle lanes will be very risky given the existing parking hazards and said congestion above. Parking needs to banned on this road irrespective of any new development						from major roads, notably the A13, A127 and A130. The Council has not declared any Air Quality Management Areas (AQMAs). Generally, air pollution is low in Castle Point. Results from the monitoring points across the Borough suggest that air quality is improving.	
0903-0002	Individual	Nicola	Carlson		Yes	HAD3	Yes		Yes			I do not believe it is justified to develop the Hadleigh Clinic site and replace with 14 homes. I don't understand how this is deemed surplus to requirements when it sometimes take 2/3 weeks to obtain an appointment. What is the alternative nearby provision as there is nowhere we can walk to and would have to drive to either Benfleet or Canvey which is not possible for many residents.	No	Not Answered		A	Objecting to HAD3 due to loss of NHS building	Policy HAD3 and Infra1 both safeguard the replacement of community facilities by ensuring that an alternative is provided and that the NHS building is surplus to requirement. Should the NHS decide that they need this building the proposed site would not be built upon.	N
0903-0003	Individual	Nicola	Carlson		Yes	HAD4	Yes		Yes			page 66 - section 10.9 states that new cycle infrastructure will be added to New Road/Scrub Land and Daws Heath road. I would really	No	Not Answered		A	Welcomes cycle infrastructure to policy HAD4 but requires parking on	Parking restrictions are controlled by the local highways authority which	N

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												welcome this but current levels of parking are too dangerous to include this. The ability to park especially in Scrub Lane should be removed at certain times of the day.					scrub lane to be banned	is Essex County Council.	
0903-0004	Individual	Nicola	Carlson		Yes	Forward	Not Answered	I would also like to add that the CPBC have not made this easy for residents to respond to and I know many people have not responded as they cannot easily work out or have the time to navigate the ability to respond	Not Answered				Not Answered	Not Answered		A	Finding the consultation difficult to respond to	Castle Point has tried to make the consultation as accessible as possible while still meeting legal requirements.	N
0904-0001	Individual	Paul	Carlson		Yes	HAD4	Yes		Yes			With regard to HAD4, this land cannot support the proposed 114 homes. Ideally I would prefer this to be developed as playing fields but if it has to be developed, it should be in keeping with the remainder of Scrub Lane. There are only 10/11 houses opposite this site and 2 down each side. A policy of in-keeping should consider no more than 30 homes. How 114 homes will fit with adequate parking of at least 2 spaces is incomprehensible. The development of Scrub Lane Mews shows how a cramped design has negatively impacted the area and 114 homes would be a huge mistake and a quota of 30 homes would be more reasonable.	No	Not Answered	Not Answered	A	Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character Air quality	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	N

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												The reason for this is as follows: -It will be sympathetic to the existing homes layout -Scrub Lane traffic and parking is getting worse each week. The building of Scrub Lane Mews has caused so many parking issues which ECC will do nothing about despite issues being raised around dangers to school children, road rage and the fact that Scrub Lane is often used as a cut through when the A13 is obstructed and on many occasions, you cannot move down the road due to congestion -The local doctor and dentist surgeries cannot cope with the current population of this area -The utilities are always failing particularly the water pipework -It will be safer for pupils attending both of the Hadleigh schools -Our own road - Woodland Close, has over 17 'track it ' issues with ECC which have not been attended to and to neglect existing residents over new development is a real failing of Essex overall, irrespective of what falls under ECC or CPBC. - There will be significant increase in levels of pollution both with the building work and the additional homes.							EPOA Parking Guidance (Part 1 and 2) to be implemented. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details. Air Quality Air quality impacts are assessed in the Sustainability Appraisal, under objective 9.1. Annual Status Reports for Castle Point can be found on the Essex Air website along with further information relating to air quality within Castle Point. Castle Point monitor nitrogen dioxide using diffusion tubes at 30 monitoring locations around the district. The main source of pollution in the Borough is road	

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												- 30 homes would offer a greater chance of green space and planting as opposed to the 'concrete over ' method which is counter to the vision and objectives and the information on page 24 /6.27 -the proposal to add cycle lanes will be very risky given the existing parking hazards and said congestion above. Parking needs to be banned on this road irrespective of any new development						traffic emissions from major roads, notably the A13, A127 and A130. The Council has not declared any Air Quality Management Areas (AQMAs). Generally, air pollution is low in Castle Point. Results from the monitoring points across the Borough suggest that air quality is improving.	
0904-0002	Individual	Paul	Carlson		Yes	HAD3	Yes		Yes			I do not believe it is justified to develop the Hadleigh Clinic site and replace with 14 homes. I don't understand how this is deemed surplus to requirements when it sometimes takes 2/3 weeks to obtain an appointment. What is the alternative nearby provision as there is nowhere we can walk to and would have to drive to either Benfleet or Canvey which is not possible for many residents.	No	Not Answered		A	Objecting to HAD3 due to loss of NHS building	Policy HAD3 and Infra1 both safeguard the replacement of community facilities by ensuring that an alternative is provided and that the NHS building is surplus to requirement. Should the NHS decide that they need this building the proposed site would not be built upon.	N

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0904-0003	Individual	Paul	Carlson		Yes	HAD4	Yes		Yes			page 66 - section 10.9 states that new cycle infrastructure will be added to New Road/Scrub Land and Daws Heath road. I would really welcome this but current levels of parking are too dangerous to include this. The ability to park especially in Scrub Lane should be removed at certain times of the day. Furthermore, the New Road junction to the A13 is awful and the congestion in New road to access the A13 is often impossible to use. This is exacerbated by Morrisons only having one exit route from the store. An exit onto the A13 would help local traffic to gain access to the A13 with greater ease.	No	Not Answered		A	Welcomes cycle infrastructure to policy HAD4 but requires parking on scrub lane to be banned	Parking restrictions are controlled by the local highways authority which is Essex County Council.	N
0904-0004	Individual	Paul	Carlson		Yes	Forword	Not Answered		Not Answered			I would also like to add that the CPBC have not made this easy for residents to respond to and I know many people have not responded as they cannot easily work out or have the time to navigate the ability to respond	Not Answered	Not Answered		A	Finding the consultation difficult to respond to	Castle Point has tried to make the consultation as accessible as possible while still meeting legal requirements.	N
0905-0001	Individual	Dav	Willison		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0906-0001	Individual	david	atlesley	none	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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0907-0001	Individual	david	bass		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley with no credible five-year housing supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified. An unsound plan will put all Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government	Add North West Thundersley site, 187Ha 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 Hadleigh at 305 Total housing target of 11,000	No	Not Answered	Not Answered	A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	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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											intervention. The policy is based on the total over development of urban sites 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. I do totally agree with the policy Had2, for the Hadleigh Farm area, which talks about this site as environmental, recreational, nature recovery (LNRS), biodiversity (APIBs), agricultural, farming activities, nature conservation, Site of Specific Scientific Interest, Ramsar site, East Coast Flyway World Heritage site, ecological restoration, habitat creation and connectivity. This site needs protection as an open space, promoting the heritage value with the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I concur that the Had2 policy is about protecting this greenbelt site as not suitable for development, with respect to urban															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 Standard method. However, once a	

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											sprawl, it is a buffer zone, the effect on the highways and traffic, the lack of infrastructure, protecting our farmland, protecting the wildlife, out of character, open space, heritage, archaeology, promoting the historic links, and that we should use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. This is confirmed by the Housing Capacity Topic Paper - August 2025, which confirms sites GB8A&B are not Potential Grey Belt, with that the complete site or sub-areas are not recommended for further consideration. We need a C6 Policy for this farmland, the South Hadleigh Green Lung. The south Hadleigh Green Lung will be protected and enhanced as a strategic green infrastructure asset between Hadleigh and Leigh on Sea. Its key role will be connecting ecological networks, protecting its ecological value, provide a strategically important ecological corridor, securing a high level of biodiversity net gain, have no adverse impact on the integrity of nearby habitats sites, support the creation														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 years of the plan the Council's aim is to deliver	

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											of new habitats, through Biodiversity Net Gain, Countryside Stewardship, to support the habitat priority measures, with the nature recovery strategy and as an area of particular Importance for Biodiversity. The Plan’s approach to biodiversity and environmental protection needs strengthening and developments should not proceed where it results in significant harm to biodiversity or protected sites unless that harm can be fully mitigated. As stated in the agricultural land document date June 2025, just over twenty-one percent of Castle Point’s land is in agricultural use, and the remaining agricultural areas in the Castle Point are increasingly fragile but contribute greatly to the Borough’s character and will be important to preserve. Also, given that the purpose of preservation is long-term food security, the benefits of preserving agricultural land applies regardless. Once the graded agricultural land is lost to development, it is lost forever. This complete site should be included for neighbourhood plans and								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. 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	

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											local green space designation. This is based on the listed assets of community value, visitors, conservation areas, registered historic site, local nature reserve, Sites of Special Scientific Interest, footpaths and cycle routes, country parks, rural footpaths and nature trails, and public rights of way. This site has areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance. I can fully support this policy Had2 with no housing development ever on this farmland site, but an unsound plan makes this site a high risk.								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. 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.	

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																		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. Green Belt/Grey belt is addressed under policy GB2. Where our Green	

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																		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. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	
0908-0001	Individual	Rosallynn	Pockington		Yes	HAD2	No	Building on green belt is not legal therefore all housing or buildings planned on the Salvation Army farmland is not legal. It has also not considered local consultation fully.	No	Justified	There is no justification for building on green belt or changing the accepted use of agricultural land to building land. There are plenty of brown land sites to be used.	Use brown land sites only and provide adequately for schools , doctors and roads.	No	Not Answered	Not Answered	B - see 0908-0002.	No building on HAD2 Infrastructure	HAD2 is not proposed for built development Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the	N

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																		supporting Infrastructure Delivery Plan (IDP).	
0908-0002	Individual	Rosalynn	Pocklington		Yes	Thun2	Not Stated		Not Answered		The plan is to ‘ optimise civic and educational facilities’ with which I agree, but to build 730 new houses is far too many. With all the new housing already around the area ,what is really needed is a new school on this site, along side the nursery already proposed. A new doctors surgery or medical centre /dentist to replace the lost clinic would serve the community far better than an increase in housing, overloading the current facilities. A link to Thundersley centre is mentioned. I hope that this would not mean a road into the Village bringing traffic chaos . However, an improvement to the current footpath would be valuable, along with cycling path. It would be best if most of this planned area behind the council offices were pedestrian only, making a safe environment for children, swimmers, mothers with prams ,etc. and include a play park. So thought should be given to adequate parking off Kiln Road, perhaps 2 or 3 storey high to save space. Any new homes built in this area		No	Not Answered	Not Answered	None	Objecting to the amount of housing on THUN2. Requesting more infrastructure and no vehicular access to thundersley village No shops on site	Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Thun2 requires a masterplan to ensure that any vehicular accesses are properly planned and that it is a cohesive development.	N

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											could be built with a double garage at ground level, and the main house above. This would save any problems with flooding, as only the car would get wet. This housing should be designated to local people and be on an affordable scheme or kept as social housing. I don't think any shops should be on this site. This area could be of great benefit if it is properly planned.								
0909-0001	Individual	Hannah	Barton-Brown		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0909-0002	Individual	Hannah	Barton-Brown		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered		A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0909-0003	Individual	Hannah	Barton-Brown		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered		A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0910-0001	Individual	Nicola	Benson		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0911-0001	Individual	Adam	Benson		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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0912-0001	Individual	Paul	Kruger		Yes	C5	No	No community involvement and this document is everything that is wrong with this consultation that makes it hard for the average tax paying home owners of Canvey to state their wishes	No	Justified	Access for emergency services on and off the island.	New road access off the island.	No	Not Answered	Not Answered	A	Lack of community engagement Third road onto canvey Emergency vehicles	Community Engagment Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement. Third road onto Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements.	N

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																		The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan. Emergency	

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																		Services Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	
0988-0007	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	ENV 3	No		No	Positively prepared, Effective, Justified, Consistent with national policy	7.1. The requirement to deliver 20% Biodiversity Net Gain (BNG) on greenfield sites is not supported, as the policy currently allows for no flexibility for instances where this cannot be achieved – and no policy benefit for achieving this over-provision. The legislative requirement is for 10% BNG. The Council has provided no evidence of the benefit arising from a requirement in local policy that seeks more than the legislative minimum of 10%, nor has it considered the viability implications on sites. The Council should also bear in mind the effect that a higher BNG requirement would have on the number of homes sites are able to deliver, meaning additional allocations may be needed to deliver the target growth requirement. This also conflicts with provisions made elsewhere		Yes	Not Answered	Yes	A	The requirement to deliver 20% Biodiversity Net Gain (BNG) on greenfield sites is not supported, as the policy currently allows for no flexibility for instances where this cannot be achieved – and no policy benefit for achieving this over-provision. The legislative requirement is for 10% BNG. The Council has provided no evidence of the benefit arising from a requirement in local policy that seeks more than the legislative minimum of 10%, nor has it considered the viability implications on	As set out in paragraph 18.29 'Local areas can set a higher requirement through their plans where it can be demonstrated it would be deliverable. Viability testing has indicated it is possible to secure 20% biodiversity net gain on greenfield sites, and this requirement has been set for those sites to improve local contribution to the local Nature Recovery network identified through the Local Nature Recovery	N

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											in the new Plan for sites to make an efficient use of available land and deliver as many homes as possible.						sites. The Council should also bear in mind the effect that a higher BNG requirement would have on the number of homes sites are able to deliver, meaning additional allocations may be needed to deliver the target growth requirement. This also conflicts with provisions made elsewhere in the new Plan for sites to make an efficient use of available land and deliver as many homes as possible.	Strategy for Essex'.	
0914-0001	Individual	Lauren	Whitlock		Yes	SP3	No	I believe other areas of Castle Point (excluding Canvey Island) Has more scope. But until infrastructure has improved for all of Castle Point, no more houses.	No	Effective, Justified			No	Not Answered	Not Answered		Infrastructure	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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0915-0001	Individual	Coral	Daly		Yes	SP3	No	Why has North West Thundersley not been included in your Plan	No	Justified, Consistent with national policy	The plan is based on the over development of Brownfield sites Why is North West Thundersley NOT included I live close to Hadleigh Castle and opposite the Salvation Army sites Castle Lane is a Lane NOT a road This area should be protected for the wildlife and heritage of this location	North West Thundersley MUST be included in your Plan This location is ideal for the number of housing required to meet local and government targets Infrastructure can be placed for schools - doctors - dentists and the sheer amount of traffic	No	Not Answered	Not Answered	A	North West Thundersley No building on HAD2	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 not preferred. Policy HAD2 does not propose any built development.	N

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0916-0001	Individual	Stuart	Cooper		Yes	HAD4	Yes	N/a	No	Consistent with national policy	Re: Objection to Policy HAD4 – Land South of Scrub Lane, Hadleigh (Proposed Allocation of at least 114 Dwellings) I write to object to the proposed allocation of at least 114 dwellings on Land South of Scrub Lane (Policy HAD4) in the Draft Castle Point Plan (Regulation 19, 2025). I believe the proposal conflicts with national planning policy (NPPF, 2024), UK environmental legislation (Environment Act 2021), and Castle Point’s own strategic and place-based policies. For the reasons set out below, the allocation should be refused or substantially modified. --- 1. Overdevelopment and Density Policy HAD4 allocates at least 114 homes on a site of approximately one hectare. This represents an excessively high density for a greenfield edge-of-settlement location. Castle Point Policy SP2 (“Making effective use of urban land and creating sustainable places”) requires density targets to	Abandon the development of the green space south of Scrub Lane. Please refer to all other comments in this Objection.	No	Not Answered	Not Answered	A	Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character Green Belt	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. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details. Green Belt This land is not	N

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											reflect the characteristics of different areas. The Scrub Lane site lies on the urban edge of Hadleigh, adjacent to open countryside, and such an intensive scheme would undermine local character. NPPF Paragraphs 119–120 require efficient land use, but emphasise that development density must reflect the prevailing character and setting. This allocation does not respect those principles and risks creating cramped, poor-quality living environments. --- 2. Loss of Green Land and Environmental Value The site is presently open green land providing important ecosystem services — biodiversity, carbon sequestration, flood absorption, and landscape character. Castle Point Policy SP1 (“Supporting an enhancement of the Borough’s green spaces”) requires the protection and enhancement of green space. HAD4 would result in its permanent loss.															allocated as Green Belt	

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											NPPF Paragraphs 179–180 require policies and decisions to protect and enhance valued landscapes and biodiversity, to deliver net gains, and to maintain ecological networks. Under the Environment Act 2021, development must provide a minimum 10% Biodiversity Net Gain. With such intensive use, it is unclear how HAD4 could achieve this without substantial off-site measures. --- 3. Infrastructure Capacity Development of 114 dwellings would generate significant additional demand on local infrastructure, services, and utilities. Castle Point Policy SP4 (“Development contributions”) requires that new development must provide adequate contributions to education, healthcare, transport, and utilities. No clear mitigation strategy has been presented for HAD4. NPPF Chapter 8 requires planning decisions to								

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											ensure sufficient provision of community facilities and services. Schools, GP surgeries, and local roads in Hadleigh are already under pressure and risk being overburdened. --- 4. Flood Risk and Drainage Castle Point is particularly vulnerable to flood risk, and development on greenfield sites can exacerbate surface water flooding. NPPF Paragraphs 167–169 (Chapter 14) require development to be directed away from areas at highest flood risk, and to provide robust mitigation including sustainable drainage systems (SUDS). The Castle Point Plan’s policies on climate resilience (SD1–SD3) similarly require comprehensive flood mitigation and sustainable drainage. HAD4 does not provide adequate assurances in this respect. --- 5. Design Quality and Local									

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											Character High-quality design is a core principle of sustainable development. The Castle Point Residential Design Guidance (2013) requires adequate space standards, privacy, amenity space, landscaping, and parking provision. A scheme of 114 dwellings on this site is unlikely to comply with these requirements. NPPF Paragraph 130 (Chapter 12 – Achieving Well-Designed Places) requires that developments: function well and add to the quality of the area; are sympathetic to local character and landscape setting; provide attractive layouts with adequate landscaping; and establish a strong sense of place. The HAD4 allocation, at its proposed density, would fail to achieve these objectives.									

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											--- 6. Green Belt / Countryside Considerations If the site falls within, or adjacent to, Green Belt designation: NPPF Paragraphs 142–160 confirm that Green Belt boundaries should be altered only in exceptional circumstances. Protecting openness and preventing urban sprawl are fundamental. The HAD4 allocation does not demonstrate exceptional justification. Even if not formally designated, the site contributes to the openness and character of Hadleigh’s edge and should be safeguarded. --- 7. Legal and Policy Inconsistencies The allocation conflicts with Castle Point Strategic Policies SP1, SP2, and SP4, as well as HAD4’s own requirement to deliver sustainable and context-appropriate growth. It conflicts with the NPPF									

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											(2024) requirements in Chapters 11, 12, 14, and 15. It may fail to comply with the Environment Act 2021 requirement for Biodiversity Net Gain. --- Conclusion Policy HAD4 – Land South of Scrub Lane is unsound because: It represents overdevelopment of a sensitive greenfield edge-of-settlement site. It causes the irreversible loss of valued green land, contrary to Castle Point and national policy. It places unsustainable pressure on local infrastructure and services. It lacks robust provision for flood risk mitigation, biodiversity, and green infrastructure. It fails the tests of soundness set out in the NPPF (positively prepared, justified, effective, consistent with national policy).									

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											For these reasons, I respectfully urge Castle Point Borough Council to remove or substantially amend Policy HAD4 from the Draft Plan.								
0917-0001	Individual	Daniel	Daly		Yes	SP3	No	North West Thundersley has NOT been included in your plan This site is ideal for a majority of housing which will not impact the local community in Hadleigh.	No	Justified, Consistent with national policy	North West Thundersley has NOT been included	There should be NO building works at all on the Salvation Army Land This is an historical site so close to Hadleigh Castle North West Thundersley	No	Not Answered	Not Answered		No building on Salvation Army Land North West Thundersley	HAD2 This policy does not propose any built development North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out	N

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																		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.	
0918-0001	Individual	Diana	Jones		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0919-0001	Individual	Michael	Payne		Yes	HAD4	Yes		No	Justified	I do not believe that 100+ new homes sighted next to a primary school would be reasonable. A better use for the land would be an extension of the school grounds with additional buildings to the school to accommodate more places for children to attend. It could encompass a special		No	Not Answered	Not Answered		Objecting to HAD4 Location next to primary school would be better used for school extension	Comments noted.	N

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											educational needs provision for children in the area which hadleigh currently lacks.								
0920-0001	Individual	Juliette	Pearce		Yes	SP3	No	While the Plan has been through consultation, I do not consider it fully legally compliant because: - It has not demonstrated a clear five-year housing land supply, which is required under the NPPF. - The Duty to Cooperate with neighbouring authorities and statutory bodies has not been evidenced by Statements of Common Ground. - The Sustainability Appraisal has not properly assessed North West Thundersley (Blinking Owl) as a reasonable alternative, despite its potential to meet housing needs in a more sustainable location.	No	Consistent with national policy	The Plan does not meet the tests of soundness because it: - Places disproportionate housing allocations on Canvey Island, despite flood risk, limited access routes, and drainage concerns. Also does not adequately address Hadleigh infrastructure issues from existing overdevelopment. Including road congestion and overstretched drainage systems. - Excludes North West Thundersley (Blinking Owl) without sufficient evidence, even though it offers lower flood risk, better road access, and potential to deliver housing numbers more sustainably. - Fails to provide a justified or deliverable housing strategy over the plan period, leaving other valuable Green Belt land vulnerable to speculative applications. - Does not align with national policy requiring robust evidence of alternatives and a deliverable five-year supply.	To make the Plan legally compliant and sound, I suggest: - Including North West Thundersley (Blinking Owl) as a strategic housing growth site. It is already part-brownfield/grey belt, has strong transport links, and could relieve pressure on more sensitive Green Belt, and on Canvey Island. - Reducing the overall allocation for Canvey Island, to reflect its unique flood and drainage risks, and reconsidering any sites where standard SUDS drainage systems would not function. - Strengthening the evidence base on housing supply so that a deliverable five-year supply can be demonstrated, giving real protection to valued Green Belt sites. Including Hadleigh farmland/Castle. - Improving cross-boundary cooperation with Essex County Council and neighbouring boroughs, particularly in relation to road infrastructure and drainage.	No	Not Answered	Not Answered		Flood risk on Canvey No five year housing land supply No duty to cooperate	Flood Risk 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	N

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																		evidence in the form of the SFRA and IDP, including in relation to Canvey. 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 important that we continue to	

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																		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 land supply position once	

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																		the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. Duty to Cooperate Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. The Council has worked collaboratively with all to ensure that the Duty to Cooperate has been met.	
0921-0001	Individual	Michael	Cook		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0988-0008	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	SD4	No		No	Positively prepared, Effective, Justified, Consistent with national policy	8.1. Persimmon Homes considers that a policy seeking to go beyond the sustainability standards set out in Building Regulations would not be effective. Building Regulations provide a national set of standards that allows housebuilders to plan with certainty, and ensures a		Yes	Not Answered	Yes	A	a policy seeking to go beyond the sustainability standards set out in Building Regulations would not be effective. Regard should be had of the Housing Minister's Written	The council has written SD4 based on robust evidence	N

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											national route towards building sustainable and energy efficient homes. 8.2. Regard should be had of the Housing Minister's Written Ministerial Statement in January 2023 which set out that the Government does 'not expect plan makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations'. The importance of the WMS was confirmed by a recent High Court judgement, which emphasised that new local plan policies must be reasonable and need to be drafted with due regard to the potential for impact on the deliverability and viability of new housing. The Council should therefore reconsider the inclusion of any policy requiring 'net zero' homes.						Ministerial Statement in January 2023 which set out that the Government does 'not expect plan makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations'. The importance of the WMS was confirmed by a recent High Court judgement, which emphasised that new local plan policies must be reasonable and need to be drafted with due regard to the potential for impact on the deliverability and viability of new housing. The Council should therefore reconsider the inclusion of any policy requiring 'net zero' homes.		
0988-0009	Agent			Persimmon Homes Ltd c/o Pegasus	Yes	SD5	No		No	Positively prepared, Effective, Justified, Consistent with national policy	8.1. Persimmon Homes considers that a policy seeking to go beyond the sustainability standards set out in Building Regulations would not be effective. Building Regulations provide a national set of standards that allows		Yes	Not Answered	Yes	A	Persimmon Homes considers that a policy seeking to go beyond the sustainability standards set out in Building Regulations would not be effective.	Noted	N

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				Group							housebuilders to plan with certainty, and ensures a national route towards building sustainable and energy efficient homes. 8.2. Regard should be had of the Housing Minister's Written Ministerial Statement in January 2023 which set out that the Government does 'not expect plan makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations'. The importance of the WMS was confirmed by a recent High Court judgement, which emphasised that new local plan policies must be reasonable and need to be drafted with due regard to the potential for impact on the deliverability and viability of new housing. The Council should therefore reconsider the inclusion of any policy requiring 'net zero' homes.						Building Regulations provide a national set of standards that allows housebuilders to plan with certainty, and ensures a national route towards building sustainable and energy efficient homes. Regard should be had of the Housing Minister's Written Ministerial Statement in January 2023 which set out that the Government does 'not expect plan makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations'. The importance of the WMS was confirmed by a recent High Court judgement, which emphasised that new local plan policies must be reasonable and need to be drafted with due regard to the potential for impact on the deliverability and viability of new		

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																	housing. The Council should therefore reconsider the inclusion of any policy requiring 'net zero' homes.		
0923-0001	Individual	Margaret	Sanderson		Yes	SP3	Yes		No	Justified	Whilst, no doubt, the plan is legally compliant, there is much that seems to be unrealistic. The traffic situation on Canvey Island, which is referred to in the section noted, is appalling! It is bad elsewhere, but the one key point, Waterside Farm roundabout, bearing the whole of the traffic going off the Island, is unworkable now, and if more houses are built, will cause a longer stand still than is already the case. If each new house has two cars, which many homes do, and people work off the Island, this roundabout will not be navigable. We cannot justify, to current residents, the building of more houses and the council should stand firm against any future development until government provide a second route - I use the term advisedly because there is only one exit - off the Island! The answer is not to sanction any planning for new builds!	I'm sure you have consulted legal persona, so it is probably legally compliant already!	Yes	Not Answered	Not Answered	A	No houses on Canvey until a third road has been built	Third road on Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to	N

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																		Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0924-0001	Individual	dar yl	hod soll		Yes	Whole Plan	Yes		No	Justified			Not Answered	Not Answered	Not Answered		The Castle Point Plan is not Legally Compliant	Comment noted.	N
0925-0001	Individual	James	Bassett		Yes	Whole Plan	No		No	Justified			Yes	Not Answered	Not Answered	A	The Castle Point Plan is not sound or Legally Compliant	Comments noted.	N

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0926-0001	Individual	Rita	Joiner		Yes	SP3	No	An alternative site - North West Thundersley should have been considered.	No	Justified, Consistent with national policy	Not consistent with national policy. Ignores Green Belt/Grey Belt against new NPPF guidelines. Has not considered all sites and particularly excludes North West Thundersley site. I agree with the Had2 Policy - particularly to protect the farmland as an open space, for nature conservation, ecological restoration and to protect Hadleigh Castle and the heritage site. Any future plans should not impact this very important piece of local history and Green Belt. Any development in that area would need serious consideration in regard to the effect on the increase of traffic and lack of infrastructure, particularly drainage/sewage.	Consideration to be given to the North West Thundersley site.	No	Not Answered	Not Answered	A	North West Thundersley Green/Grey Belt Supports HAD2	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 not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the	N

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																		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, 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	

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																		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 appropriate development site for those reasons set out above. Support for HAD2 noted.	

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0927-0001	Individual	BEVERLEY	GROVES		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley	No	Justified, Consistent with national policy	Does not meet the housing target for castle point. ignores green belt/Grey belt against new NPPF guidelines the draft local plan is not justified. site selection strategy is biased and predetermined towards a "no green belt build policy. Site selection is based on the over development of Brownfield sites. Not considered all sites, no greenbelt/Greybelt sites added with the exclusion of North West thundersley. NPPF guidelines state developmennt should be directed away from areas of high risk of flooding. SUDS measures are not appropriate for Canvey Islands geography and drainage infrastuture. The 3316 urban homes for Canvey Island is not resident led. Canvey West homes puts residents in East at risk with Emergency evacuation procedures. Canvey is becoming more and more grid locked and an unpleasant place to live. there is no consideration for long term residents and the situation is becoming intolerable as it stands without additional projected number of housing that is proposed to be built. the infrastructure is poorly maintained and is	Add North West Thundersley stie 187A a Green belt/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	Not Answered	Not Answered	A	Doesn't meet housing targets Green/Grey Belt North West Thundersley Flooding on Canvey	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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											not there for these proposed buildings and additional residents.							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,	

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																		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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																		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. 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	

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																		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 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	

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																		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.	

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0928-0001	Individual	Sam	Preston		Yes	HAD4	No	It has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Positively prepared, Justified, Consistent with national policy	Justified - whilst it states that building should be in keeping with the aesthetic of Scrub Lanes other homes, it fails to account for 114 homes squeezed into a space that the rest of scrub lane would expect a maximum of 20 homes. The homes in this area have green spaces for families and do not seek to squeeze. Additionally 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. 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. The Had4 Policy is a perfect example of the over development urban policy, with an unrealistic proposal for 114 homes, using the Castle Point Density and Capacity Study, and a 100dph urban	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, Hadleigh at 305. Revise Scrub Lane development to 20 family homes. Total housing target of 11,000.	No	Not Answered	Not Answered	A	North West Thundersley No five year housing land supply Objecting to number of houses on HAD4 Green/Grey Belt	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 not preferred. No Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to	N

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											guide, in a residential area of housing currently having homes at 20dph. Housing on this site at 100dph would equate to six blocks of flats, four flats per floor, and four stories high, which is out of character for the area. The statement that the frontage of the development is designed to reflect the character of Scrub Lane, is a complete fabrication, as the houses opposite relates to approx. 15dph and it will never match the current street scene. The addition of 114 homes, and over 200 cars, would cause major issues at the Scrub Lane / Rectory Rod traffic lights. The local 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 plan also needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development												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 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	

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											and all our precious Greenbelt sites need total protection from government intervention. 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.							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 land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. Density on HAD4 The density chosen for this site was informed by the Density and	

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																		Capacity Study July 2025, please see this for further details. 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 environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of	

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																		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 appropriate development site for those	

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																		reasons set out above.	

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0929-0001	Individual	Neil	Perry		Yes	SP3	Yes		No	Positively prepared, Effective, Justified	I do not believe the current plan is sound and acceptable for the following reasons: 1. The Council has not yet demonstrated a deliverable five-year housing land supply in its current format which is a fundamental test of the the plans credibility. 2. In order to do this it has to pass 4 tests of soundness which are that it is positively prepared, justified, effective and consistent with the National policy - I believe the current plan does not meet these essential criteria fully. I appreciate they have endeavoured to protect the Green belt sites which are a much loved and beautiful feature of the area but in doing that I do not believe they have considered an option which is worth considering. 3. The overall housing target for Castle Point that has been imposed centrally is simply impossible to meet without permanently damaging the character and beauty of the area which is appreciated and hugely enjoyed by the communities in the area and causing serious failure of the local infrastructure which all of us rely on a daily basis but is already struggling to cope. 4. The current proposed	Please refer to my previous answer above In summary the current plan requires revision to meet the soundness tests, the number of homes on Canvey should be reconsidered, the shortfall addressed by improving the brownfield strategy and including North West Thundersley to improve the plan significantly and thereby reducing the gap to housing target in the process. Essex Council would be legally obliged to co-operate through its infrastructure investment to take advantage of North West Thundersley as a key strategic opportunity for sustainable growth.	No	Not Answered	Not Answered	A	No five year housing land supply Exclusion of North West Thundersley Canvey Flooding Third road onto canvey	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 important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It	N

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											plan is set to deliver only around 50% of the Governments housing target a shortfall of over 5,000 homes over the plans timeline. The current plan does not justify this shortfall whilst I have said above that it is clear that although the environmental constraints and infrastructure issues are included, in order to justify the inability to meet the full target the council does need to provide sufficient evidence that these are clearly demonstrated and that it has considered every viable alternative in oder for the plan to be "sound". The exclusion of North West Thundersley in the current plan undermines the credibility of the plan. 5. The sustainability appraisal within the plan does not assess North West Thundersley site in sufficient depth or with the rigour that has been applied to the other locations - this in itself renders the current plan unsound and in turn the five year housing land supply is not sufficiently demonstrated with the reliance on constrained sites casting serious doubt on deliverability of the plan 6. The NPPF is clear through paragraphs 159 and 161 that any development should be								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 land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see	

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											away from areas at the highest risk for flooding - this has most impact on the Canvey Island proposal in the plan which although it has current effective mitigation in this regard any future adjustments required to the sustainable urban drainage systems are of a unique nature so as not to upset the balance of the existing drainage network and any on sire drainage systems unable to mechanically discharge or be connected into a properly managed system pose an unacceptable risk - Canvey has a unique geography and the plan does not reflect this in reality or show how the risk of new flooding or contamination of the groundwater would be mitigated. 7. The current plan places too much housing demand on Canvey Island despite its history, unique geography and serious infrastructure limits so building 3,300 homes there is excessive and not justified in the current plan. Canvey also only two access points which is a serious which is strategically a serious weakness 8. The exclusion of North West Thundersley is difficult to understand - it has far better transport								housing topic paper. 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 not preferred. Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood	

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											connectivity, much lower flood risk and is supported strongly in the local areas - this site is mainly plotlands and industrial units and any development there would impact far fewer residents - excluding it is not justified well enough in the current plan and the Sustainability Appraisal fails to assess it as a reasonable, viable alternative. 9. In my opinion I believe that the housing number for Canvey should be reduced and also be contingent upon clear robust measures against flooding, including a unique and comprehensive drainage plan together with exploring the need for a third access route to alleviate the gridlock situation that currently exists on and off the island - North West Thundersley offer a better alternative with better connections, a lesser flood risk and the potential for a much better infrastructure. The site (including the area known as the Blinking Owl) has previously been recognised in earlier studies as being capable of providing space for up to and in excess of 5,000 homes. The combination of the two measures (Canvey Reduction and use of North Thundersley) would provide for a greater number of									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 and IDP, including in relation to Canvey. Third Road onto Canvey The plan has	

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											houses and reduce the short fall of the current plan to a more acceptable level and much closer to the Government Assessed need. 10. Claims that the North Thundersley site is not viable due to policy restrictions by the local Highways Authority are not justified in the plan and do not pass scrutiny - the current investment in the Fairglen Interchange of £59 million includes new slip roads, signal junctions and pedestrian and cycling infrastructure are designed to help accommodate future housing and economic growth for South Essex. There is an acknowledgement in Essex Councils infrastructure planning documents that the A127/A130 transport corridor will come under further pressure and that long term options to expand it remain viable. 11. Although part of the North Thundersley site are designated as Green Belt; including it can be justified under paragraph 143 of the NPPF which says that Green Belt release is allowed where exceptional circumstances can be demonstrated clearly - in this case Castle Point has a severe housing shortfall, and North West								been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex	

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											Thundersley offers an area where growth can be delivered in a safe way, sustainably and with less environmental impact and will affect fewer residents as it is mainly "grey belt" inaccessible land, industrial units and plotlands. This fits the terms of strategic release of green belt by protecting more sensitive areas and placing growth where it can supported properly 12. To conclude the current plan requires revision to meet the soundness tests, the number of homes on Canvey should be reconsidered, the shortfall addressed by improving the brownfield strategy and including North West Thundersley to improve the plan significantly and thereby reducing the gap to housing target in the process. Essex Council would be legally obliged to co-operate through its infrastructure investment to take advantage of North West Thundersley as a key strategic opportunity for sustainable growth.							specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	

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0930-0001	Individual	Cheeryl	Perry		Yes	SP3	Yes		No	Effective, Justified, Consistent with national policy	My concerns regarding the soundness of the plan I wish to record my concerns regarding the soundness to the current version of the Castle Point Local Plan. While I acknowledge the Council's efforts in formulating a development strategy that preserves the green belt land, I do not believe the draft plan is sound. There are several critical weaknesses, particularly in terms of housing delivery, site selection, infrastructure capacity, and the inclusion of viable alternatives. I've summarised my concerns below: 1. Lack of a Demonstrable Five-Year Housing Land Supply A key requirement of national planning policy is that local authorities must demonstrate a deliverable five-year housing land supply. The current plan has a number of omissions and falls far short of the Governments housing target requirement achieving only 53% of the requirement. Whilst I believe the Government target is not wholly achievable the plan needs to demonstrate that all	See my comments above	No	Not Answered	Not Answered	A	No five year housing land supply Exclusion of North West Thundersley Infrastructure Not meeting housing targets without justification	No 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 important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It	N

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											alternatives have been properly considered and there are omissions in the current plan. 2. Insufficient Consideration of Alternatives Undermines the Plan's Soundness The Local Plan must satisfy four key tests: it must be positively prepared, justified, effective, and consistent with national policy. Although the Council has sought to protect the Green Belt—a valued asset in the borough—it has failed to properly consider other reasonable and sustainable alternatives. The exclusion of North West Thundersley, despite its development potential and relatively low environmental sensitivity, undermines the plan's justification and raises questions about whether the strategy has been robustly tested. 3. Overambitious Targets with Negative Local Impact The centrally imposed housing requirement for Castle Point is extremely difficult to meet without placing an unacceptable burden on local infrastructure and causing long-term harm to the character of the borough. The plan proposes growth in														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 land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see	

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											areas that are already stretched in terms of services, traffic capacity, and environmental resilience. Without more balanced site selection, the plan risks doing more harm than good. 4. Inadequate Justification for Housing Shortfall The current draft only aims to deliver around 50% of the total housing need—leaving a shortfall a significant shortfall. While constraints such as flood risk and infrastructure limitations are acknowledged, the plan does not provide sufficient evidence that every reasonable alternative has been explored to reduce the gap. The exclusion of North West Thundersley is particularly concerning in this context, as its inclusion could significantly reduce the shortfall in a sustainable way. 5. Lack of Rigorous Assessment for North West Thundersley The Sustainability Appraisal fails to assess North West Thundersley with the same level of detail and objectivity applied to other sites. This inconsistency calls into question the transparency of the site selection process. Given the potential of the area to								housing topic paper. 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 not preferred. Infrastructure Infrastructure matters (including healthcare and education) are	

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											support development with lower environmental and infrastructure risks, its dismissal is not adequately justified and compromises the robustness of the overall plan. 6. Flood Risk Not Properly Addressed for Canvey Island National planning policy clearly advises against placing development in areas of high flood risk unless absolutely necessary and without proper mitigation. Canvey Island is uniquely vulnerable due to its geography and reliance on complex drainage systems. While the plan references existing mitigation, it does not demonstrate how future drainage needs would be managed or how risks to groundwater and flood safety would be contained as development expands with the proposed 3,300 houses. 7. Excessive Development Burden on Canvey Island Allocating 3,300 new homes to Canvey Island is disproportionate, given its limited road access, historical flood issues, and already overburdened infrastructure. The island has only two access points, creating a major															covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). 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	

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											vulnerability during peak traffic or emergencies. The scale of development proposed for Canvey is not matched by any convincing infrastructure upgrades in the plan and appears unjustified in the broader context of available alternatives. 8. Unjustified Exclusion of North West Thundersley North West Thundersley has strong potential to accommodate housing growth: it has better transport links, minimal flood risk, and is supported locally. The area includes a significant amount of low-value land such as industrial sites, plotlands and inaccessible land. Its exclusion from the plan lacks a sound explanation and ignores a viable, lower-impact alternative that could help meet housing needs more sustainably, significantly reduce the gap to target and with less disruption to existing communities. 9. Balanced Strategy Required: Reduce Canvey Allocation and include the North West Thundersley site. A more effective and balanced strategy would be to scale back the housing numbers allocated to								keeping with the NPPF when read as a whole, to deliver this scale of growth in 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.	

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											Canvey Island, making any development there contingent on clear, enforceable flood mitigation plans and improved access. In parallel, North West Thundersley should be brought forward for housing allocation and added to the proposal, although classified as some green belt it meets the requirements for a justified green belt exception unlike other green belt sites in the locality. Previous studies have identified this area (also known as the Blinking Owl site) as being capable of delivering in excess of 5,000 homes. This would help address the housing shortfall while placing development where infrastructure and environmental risks are more manageable. 10. Transport Constraints Argument Not Substantiated Claims that North West Thundersley cannot be brought forward due to local highways policies do not withstand scrutiny. The planned £59 million upgrade of the Fairglen Interchange will introduce new capacity through additional slip roads, signal junctions, and pedestrian/cycle links.								

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											Essex County Council’s own infrastructure documents acknowledge that the A127/A130 corridor will likely need to be expanded to support future growth. The assertion that the area is not viable due to Highways Authority restrictions is therefore incorrect and not a viable reason to exclude the North West Thundersley site. 11. Green Belt Release Justified by Exceptional Circumstances While part of North West Thundersley lies within the Green Belt, national policy (paragraph 143 of the NPPF) allows for Green Belt release in cases of exceptional need. Castle Point’s acute housing shortfall and lack of available unconstrained land qualify as such circumstances. Much of the land in question is of low environmental value—largely made up of plotlands, inaccessible land and industrial uses (grey belt)—and its development would be far less intrusive than building in the other green belt areas. 12. Conclusion and Recommended Changes In its current form, the Local Plan does not meet								

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											the tests of soundness and should be revised. Key changes required include: A reduction in the scale of development proposed for Canvey Island, contingent upon stronger flood protections and access improvements. The inclusion of North West Thundersley as a strategic housing site. A more transparent and evidence-based justification for site selection and housing distribution. A strategy that brings the plan closer to meeting the full housing requirement while aligning with sustainable development principles. Castle Point has a responsibility to deliver new homes, but this must be done in a way that protects residents, infrastructure, and the environment. A more balanced, evidence-led approach would significantly improve the soundness and deliverability of the plan.								
0931-	Individual	Ryan	Leonard		Yes	Whole	No		No	Positively prepared, Effective,			Not An	Not Ans	Not Ans		The Castle Point Plan is not sound or Legally Compliant	Comments noted.	N

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0001						Plan				Justified, Consistent with national policy			swere d	wered	were d				
0932-0001	Individual	Sarah	Leonard		Yes	Whole Plan	No		No				Not Answered	Not Answered	Not Answered		The Castle Point Plan is not sound or Legally Compliant	Comments noted.	N
0933-0001	Individual	Jennie	Cavill		Yes	SP3	Yes		No	Effective, Justified	I am concerned that with the traffic and parking already under strain, we can not support this amount of new housing. We also have a child care issue in the local area, where will any new children be going to school ? Have the local nursery's/schools been geared up to help support parents ? Please speak to local nurseries who have closed waiting lists ?	Consideration into the above points.	No	Not Answered	Not Answered		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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0934-0001	Individual	John	Stone		Yes	SP3	No	Excluding and/or failing to adequately consider strategic alternatives across the Borough, including the obvious site North West Thundersley commonly known as the Blinking Owl site. Due to a lack of consideration of perfectly reasonable green belt / grey belt sites the proposed plan appears to be predetermined due to a no building on green belt policy. There is no credible five year housing land supply. Due process has not been fulfilled in that the Regulation 18 and this regulation 19 Consultation has been overly complicated and onerous for the average person to complete and hence the individuals right to engagement in the process with many residents giving up on their right to make a proper response. The right to make an informed response has been denied due to the poor set up at the open meetings. There is no clear evidence of the fulfillment of the Council's 'Duty to Co-Operate.	No	Effective, Justified, Consistent with national policy	The draft local plan is not consistent with National Policy. It does not meet the housing target for Castle Point. The Council has not provided adequate and strong enough evidence for not meeting the Government's housing targets. Development should be directed away from areas of highest risk of flooding. Canvey Island has the highest flood risk category in the Borough and yet has been allocated the highest number of dwellings of all the Borough areas. There is a risk of tidal flooding in the future due to environmental challenges. The surface water drainage often only just copes and at times, and additional dwelling on this scale will make the problems worse leading to more surface water flooding incidents. The foul water system is pumped, often through small bore pipework, and barely copes at times with the present dwelling numbers on the Island. Due to Canvey Island's unique geography there is a need for open undeveloped land to act as drainage and flood planes. The Strategic Drainage Design measures applied are not appropriate for Canvey Island's unique geography and drainage	The North West Thundersley site should be included in the plan. The site is approximately 187 hectares of Green Belt, Brown Belt, Green Belt land possibly accommodating 7500 dwellings. Adoption of this site would least significantly affect the residents of Castle Point and is far more suitable for development than Canvey West. Reducing the urban housing target for the Borough from 6200 dwellings to 3500 dwellings including reducing Canvey Island's allocation to 1050 dwellings. Include the provision that none of the final housing allocation on Canvey Island be built until the road infrastructure is totally overhauled and improved. Include the provision that no dwellings be built within the blast radius of the two Top Tier COMAH sites.	No	Not Answered	Not Answered	A	North West Thundersley Green/Grey Belt No five year housing land supply Consultation process difficult Not meeting the housing target Flood Risk on Canvey Transport COMAH Emergency evacuation	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 not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the	N

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											infrastructure. The road system on Canvey Island cannot cope at peak times or if there is a road traffic incident on or around the Island, the Island is often gridlocked. The road network needs much improvement as things stand and would not cope with an additional 3000 plus dwellings. It can take 45 minutes to get from the Town Center to the Canvey West area (under two miles in distance) and adding 2000 homes in Canvey West would make the journey unbearable both at the West end of the Island and further down the Island due to the backing up effect and due to the additional dwellings to the South and the Town Center. The proposed Canvey West site is very close to the two Top Tier COMAH sites situated on the Island. When considering what happened in Buncefield this exposes residents in any new development in Canvey West to un-necessary risk. Emergency escape for the whole Island would be impossible. The site selection strategy appears to be biased and predetermined towards a 'no green belt inclusion' policy. The Council have not considered adequately other Grey Belt/ Green Belt														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, 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	

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											sites and excludes the North West Thundersley (Blinking Owl) option which therefore directs development towards unsuitable and higher risk areas such as Canvey West. The Canvey West proposal puts other residents on the Island at higher risk in the event of an emergency evacuation requirement. The 3000 plus dwellings proposed for Canvey Island including the 2000 for Canvey West is not resident led. The suggested density of homes in Canvey West is far to high and needs to be reduced. The density would suggest that buildings would need to be built higher which would completely alter the nature of the area and Island. Canvey Island is classified as having the highest level of deprivation in Castle Point and the proposed plan will not improve the situation in any way likely making the situation worse. The 3000 plus dwellings for Canvey Island and the 2000 dwellings proposed for Canvey West should be reconsidered. It does unfortunately appear that the Council have decided to dump the Borough's housing numbers on Canvey Island. The Castle Point Plan, as it													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 appropriate development site for those reasons set out above. No 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,	

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											stands, will be detrimental to the Health and Wellbeing of the Island residents.							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 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	

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																		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 land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. Consultation Process concerns Comments noted. The council has prioritised inclusivity for the consultations.	

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																		Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement. 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,	

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																		sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in 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. Flood Risk 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	

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																		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 and IDP, including in relation to Canvey. Transport The plan has been subject to detailed Transport Assessment, assessing impacts and recommending	

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																		local interventions. These are identified in the Infrastructure Delivery Plan. Alongside this, the Local Transport Authority, Essex County Council, have prepared the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex includes wider local improvements to transport networks in and around Castle Point, including improved linkages to other areas. Growth in Castle Point will facilitate the delivery of the proposals in the Local Transport Plan 4. COMAH As set out in Plan paragraph 8.28 ‘Both port facilities are registered as Control of Major Accident Hazards (COMAH) sites	

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																		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 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	

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																		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 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,	

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																		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'. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/	

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0934-0002	Individual	John	Stone		Yes	E1	No	Excluding and / or failing to adequately consider strategic alternatives across the Borough. There is no clear evidence of the fulfillment of the Councils 'Duty to Co-operate.	No	Effective, Justified, Consistent with national policy	The nature of Charfleets Industrial Estate and the types of businesses contained on it has not been properly evaluated. Many of the businesses do not appear to have any idea of what is being proposed. These types of businesses are not suitable for habitable dwellings above them. Should redevelopment of the estate proceed at the level suggested this would cause severe problems for many of these businesses leading to many of them closing down either willingly or forcibly. Any new estate as suggested with dwellings above the businesses would soon become like a ghetto and would not be a very nice place to live and would be detrimental to the Health and Wellbeing of the estate's residents. Charfleets is within the blast radius of the two Top Tier COMAH sites. The drainage system, both surface water and foul, would not cope.	Reduce the urban housing target for the Borough. Consider other more suitable sites across the Borough especially North West Thundersley.	No	Not Answered		A	Strategic Alternatives Duty to cooperate Concerned about the business uses next to residential on E1 COMAH Flood Risk on Canvey North West thundersley	Strategic Alternatives North west Thundersley is in the Greenbelt. 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 CPBC 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. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the	N

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																		Sustainability Appraisal (SA). Duty to Cooperate Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. The Council has worked collaboratively with all to ensure that the Duty to Cooperate has been met. Buisness uses next to residential on sites covered by policy E1 ie C4 West Canvey. This states at paragraph 8.36 There are a mix of uses within the industrial estate including offices, gyms, nurseries, car sales and also heavier industry such as steel manufacturing. It is therefore important that the Master Plan for the area sets out a land use	

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																		strategy that encourages renewal and regeneration but avoids issues of residential amenity and addresses the agent of change principle for noisy businesses already in the area. COMAH 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	

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																		development. Both installations have HSE consultation zones identified around them, in which it is expected that other development is 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	

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																		management and maintenance, and also at the point where new development is proposed.’ The current HSE consultation zones are 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	

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																		installations. Where the HSE advises against development the planning application will be refused on health and safety grounds’. Flood Risk 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	

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																		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. 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	

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																		North West Thundersley was not preferred.	
0935-0001	Individual	Ian	Carey		Yes	Whole Plan	Yes		Yes	Consistent with national policy			No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0936-0001	Individual	Graham	COOK	NO	Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0937-0001	Individual	Jonathan	Pinnock		Yes	SP1	Yes		Yes		Over many years, Castle Point residents have insisted that all Green Belt land in the area should be protected at all costs - this		Not Answered	Not Answered	Not Answered	A	Supports policy SP1	Support noted.	N

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											policy acknowledges that desire.		ered						
0937-0002	Individual	Jonathan	Pinnock		Yes	Thun4	Yes		Yes		This policy supports residents views that green spaces and SSSI sites around and within Thundersley should be protected and enhanced.		Not Answered	Not Answered		A	Supports policy THUN4	Support noted.	N
0937-0003	Individual	Jonathan	Pinnock		Yes	SP2	Yes		Yes		Over the years, Castle Point has become far more populated than its infrastructure can sustain with inadequate roads, medical resources etc. (Nb Residents from other boroughs travel through Castle Point to work etc and therefore junctions such as at the A127/A130, Rayleigh Weir, and Sadlers Farm are dreadfully congested). Ideally I would prefer no extra housing in Castle Point but recognise the unacceptable pressure placed on CPBC by the UK government in terms of housing targets. Consequently, restricting the number of new homes and particularly restricting them to Brownfield sites would seem a reasonable compromise.		Not Answered	Not Answered		A	Supports policy SP2	Support noted.	N
0937-0004	Individual	Jonathan	Pinnock		Yes	Thun5	Yes		Yes		It is vital to maintain the green spaces between Benfleet and Thundersley not only to maintain their uniqueness, but also to prevent the inevitable urban sprawl that would ensue if any development in this area were allowed		Not Answered	Not Answered		A	Supports policy THUN5	Support noted.	N

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											(whether official Green Belt or not). It also protects wildlife.								
0937-0005	Individual	Jonathan	Pinnock		Yes	DH1	Yes		Yes				Not Answered	Not Answered		A	Supports Policy DH1	Support noted.	N
0937-0006	Individual	Jonathan	Pinnock		Yes	DH2	Yes		Yes				Not Answered	Not Answered		A	Supports Policy DH2	Support noted.	N
0937-0007	Individual	Jonathan	Pinnock		Yes	GB1	Yes		Yes		Protection of the Green Belt and maintaining the natural environment should take priority over any new development in Castle Point		Not Answered	Not Answered		A	Supports Policy GB1	Support noted.	N
0937-0008	Individual	Jonathan	Pinnock		Yes	ENV1	Yes		Yes				Not Answered	Not Answered		A	Supports Policy ENV1	Support noted.	N
0937-0009	Individual	Jonathan	Pinnock		Yes	ENV4	Yes		Yes				Not Answered	Not Answered		A	Supports Policy ENV4	Support noted.	N
0937-0010	Individual	Jonathan	Pinnock		Yes	ENV6	Yes		Yes				Not Answered	Not Answered		A	Supports Policy ENV6	Support noted.	N
0937-0011	Individual	Jonathan	Pinnock		Yes	Infra1	Yes		Yes				Not Answered	Not Answered		A	Supports Policy INFRA1	Support noted.	N

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													ered						
0937-0012	Individual	Jonathan	Pinnock		Yes	Infra2	Yes		Yes				Not Answered	Not Answered		A	Supports Policy INFRA2	Support noted.	N
0937-0013	Individual	Jonathan	Pinnock		Yes	Infra3	Yes		Yes				Not Answered	Not Answered		A	Supports Policy INFRA3	Support noted.	N
0937-0014	Individual	Jonathan	Pinnock		Yes	Infra4	Yes		Yes				Not Answered	Not Answered		A	Supports policy INFRA4	Support noted.	N
0937-0015	Individual	Jonathan	Pinnock		Yes	Infra6	Yes		Yes				Not Answered	Not Answered		A	Supports policy INFRA6	Support noted.	N
0937-0016	Individual	Jonathan	Pinnock		Yes	T1	Yes		Yes		There are already road junctions and roads that are consistently over-congested in Castle Point. Note that it isn't only Castle Point residents that use roads within the borough and with other councils being forced to also increase their housing stock levels, this problem is set to become even worse. Proper measurements of traffic at these key locations should be undertaken with local		Not Answered	Not Answered		A	Supports Policy T1	Support noted.	N

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											residents in attendance so that those measurements are taken at appropriate times. Some previous traffic measurements have been undertaken at times when it is known that traffic is lighter than usual. Authorities should resolve existing traffic congestion within Castle Point and on its boundaries with other boroughs before even considering increasing housing. No housing should be located near an existing traffic hotspot e.g. A127/A130 junction, Rayleigh Weir, Sadlers Farm, Woodmans Arms, or where those junctions could be adversely affected by the additional traffic from extra homes built nearby.								
0937-0017	Individual	Jonathan	Pinnock		Yes	T2	Yes		Yes				Not Answered	Not Answered		A	Supports Policy T2	Support noted.	N
0937-0018	Individual	Jonathan	Pinnock		Yes	T4	Yes		Yes				Not Answered	Not Answered		A	Supports Policy T4	Support noted.	N
0937-0019	Individual	Jonathan	Pinnock		Yes	T5	Yes		Yes				Not Answered	Not Answered		A	Supports Policy T5	Support noted.	N

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0937-0020	Individual	Jonathan	Pinnock		Yes	T7	Yes		Yes				Not Answered	Not Answered		A	Supports Policy T7	Support noted.	N
0938-0001	Individual	Joanne	Guyett		Yes	HAD4	Yes		No	Positively prepared, Effective, Justified	Justified - The frontage of the development would not reflect the character of the area. Consideration should be given to the site - The North West Thundersley. 114 homes on this area of land (using the Castle Point Density and Capacity Study, and 100dph urban guide) would equate to six blocks of flats, four stories high. This is completely out of character for the area and would cause no end of traffic issues as well as GP surgeries and schools unable to cope. The local secondary school is already full and children are having to travel further afield for a school place. This over development policy will affect the highways and traffic and there is a lack of infrastructure, drainage and sewage in the urban area, therefore is not of effective soundness.	In order to be Justified, consideration of The North West Thundersley site should be considered as an alternative to this site. This would reduce the over development of urban sites.	No	Not Answered	Not Answered		Objects to HAD4 because: Density Traffic Infrastructure Allocate North West Thundersley instead	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. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-	N

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																		6 and the supporting Infrastructure Delivery Plan (IDP). 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 not preferred.	

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0939-0001	Individual	Greer	Stone		Yes	SP3	No	The Consultation is overly complicated and onerous for the average person to complete. The Consultation events were not run as a proper consultation and were more of a display saying this is what we are going to do. The above the residents right to engagement and right to response has been denied. There is no clear evidence of the Council's duty to co-operate with other authorities such as Essex County Council or Anglian Water. I have been told that there has not been a proper discussion with Anglian Water (Canvey Island's sewage authority) regarding the excessive number of dwellings being added to the already overloaded sewage system. The Council has not adequately considered strategic alternative sites across the Borough. The Council have proposed that nearly half of the Borough's assessed housing needs be placed in the highest flood risk area in the Borough. The Council have not taken proper consideration of the two Top Tier COMAH sites on Canvey Island.	No	Positively prepared, Effective, Justified, Consistent with national policy	The Plan is not resident led for Canvey Island. Development should be directed away from areas of highest flood risk. Canvey Island is the highest flood risk category in the Borough. There has been no proper consultation with the sewage authority for Canvey Island. The foul water system barely copes at present and would be overwhelmed if 3000 plus additional homes were added. The proposed Canvey West Site and Charfleets site are dangerously close to the two Top Tier COMAH sites exposing potential residents to unnecessary risk. The Canvey Island proposals are not resident led. The Canvey Island West proposal puts the Island at risk in the event of an emergency evacuation. The road network is gridlocked as things stand and cannot cope with the additional homes being proposed. The routes on and off the	The urban housing target for the Borough should be reduced especially for Canvey Island with consideration being given to building on greybelt or small areas of suitable greenbelt instead. Include provisions that none of the final housing allocation on Canvey Island be built before the road and drainage infrastructure is totally overhauled and improved. Include a provision that no additional homes be built near the two Top Tier COMAH sites. Adjust the proposed plan directing new building away from the highest flood risk areas of the Borough. Include the North West Thundersley site (Blinking Owl) in the plan. This site would create its own small village with all of the necessary infrastructure and would lead to the least disruption to the Borough overall.	No	Not Answered	Not Answered	A	Consultation too complicated Duty to Cooperate Other strategic sites not considered Flood Risk on Canvey COMAH Transport Greenbelt/Greybelt	Consultation Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement. Duty to cooperate Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. The Council has worked collaboratively with all to ensure that the Duty to Cooperate has been met. Other strategic sites not considered All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the	N

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											Island is gridlocked for much of the day and at weekends and so many additional homes would impair on the quality of life for Island residents.							Sustainability Appraisal (SA). Flood Risk 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	

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																		form of the SFRA and IDP, including in relation to Canvey. COMAH 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	

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																		expected that other development is 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.'	

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																		The current HSE consultation zones are 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	

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																		safety grounds’. Transport The plan has been subject to detailed Transport Assessment, assessing impacts and recommending local interventions. These are identified in the Infrastructure Delivery Plan. Alongside this, the Local Transport Authority, Essex County Council, have prepared the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex includes wider local improvements to transport networks in and around Castle Point, including improved linkages to other areas. Growth in Castle Point will facilitate the delivery of the proposals in the Local Transport Plan 4.	

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																		Green/GreyBelt 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, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the	

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																		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 appropriate development site for those reasons set out above.	

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0940-0001	Individual	Callum	Pickrell		Yes	HAD4	Yes		No			The proposed site-Had4 - Land South of Scrub Lane for 114 new homes is not practical. Throughout the week during the school run all you have to do is go down scrub lane and you'll see how busy it is already, adding 114 houses to that plot of land with an average of 2 cars per family is over 200 additional cars on the road. The foundations are simply not setup to support this, not to mention the impact it will have on all the local amenities. The trees down scrub lane which make it a pleasant road to walk down would all be cut down and replaced with ugly new build houses.	No	Not Answered	Not Answered		Objects to HAD4 because: increased number of cars Infrastructure	Increased number of cars Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. 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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0988-0010	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	Forward	No		No	Positively prepared, Effective, Justified, Consistent with national policy	1.1. These representations to the Castle Point Plan (“the new Plan”) consultation are made by Pegasus Group on behalf of Persimmon Homes Ltd. Persimmon Homes has various interests in Castle Point which are promoted for residential-led development: • Land West of Benfleet (GB5) • Land East of Canvey Road, Canvey Island (GB2) • Land at The Chase, Thundersley (GB12) 1.2. As these representations will highlight, national policy is very clear on the approach that should be taken to plan positively to maximise the available opportunities to meet local housing need. The new Plan that is presented by the Council simply does not provide sufficient justification or evidence for a departure from national policy. Persimmon Homes therefore has significant concerns about the ability for the new Plan to be found sound, if it was to be submitted for Examination in its current form. The deficiencies are throughout the new Plan and its supporting evidence base, from the housing requirement that has been		Yes	Not Answered	Yes	A	National policy is very clear on the approach that should be taken to plan positively to maximise the available opportunities to meet local housing need. The new Plan that is presented by the Council simply does not provide sufficient justification or evidence for a departure from national policy. Persimmon Homes therefore has significant concerns about the ability for the new Plan to be found sound, if it was to be submitted for Examination in its current form. The deficiencies are throughout the new Plan and its supporting evidence base, from the housing requirement that has been calculated, to the spatial strategy that have been set out, to the housing supply that has been assumed (see Q45). Persimmon Homes also has	Comments noted and response provided to specific policy comments	N

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											calculated, to the spatial strategy that have been set out, to the housing supply that has been assumed (see Q45). Persimmon Homes also has concerns about the soundness of several development management policies, as also set out in these representations. 1.3. An up-to-date Local Plan is critical for effective plan making. The current development plan was adopted in 1998, and had a plan period that ended in 2001 with the intention being for an early review to take place. Indeed, the current development plan was out-of-date at the point of adoption, given the first consultation took place in 1991 and it began the Examination process in 1994. 1.4. The lack of an effective and up-to-date local plan has had clear impacts on the Borough. The Council has consistently failed to demonstrate a five year supply of housing, with one of the worst housing supply positions in the country. The Council has also consistently failed the Housing Delivery Test since it was introduced in 2019. These are not just numbers; this failure has had, and						concerns about the soundness of several development management policies, as also set out in these representations.		

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											continue to have, real impacts on real people. As quoted in the new Plan itself, the Borough has a housing register of 600 households, an affordability ration where house prices are 11 times above local wages, areas of high deprivation, and general low economic productivity. The Council’s own Equality Impact Assessment (July 2025) for the new Plan highlights the significant negative impacts associated with a spatial strategy that does not provide for local housing needs. 1.5. The Council has a history of failing to prepare and adopt local plans. Several attempts over the previous 25 years have failed at examination, or been abandoned. The closest the Council got was in 2022 where a plan was found sound by the Planning Inspectorate – but which was subsequently withdrawn at the final stage prior to adoption. The sites promoted by Persimmon Homes were all allocated in this withdrawn Local Plan, and were found sound by the Inspector. 1.6. Given this history of failure in the development plan process, and the clear									

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											associated impacts, it would be logical to assume that the Council would make all efforts to prepare a sound and effective Local Plan. That is surely owed to the local community. The Council instead seems insistent on following an approach that will be found unsound and lead to yet another failed local plan – leading to additional cost for the local taxpayer, and further delay at securing an effective spatial plan for the Borough.								
0942-0001	Individual	Tim	Wratislaw		Yes	HA D4	Yes		No	Justified	The plan to add 114 new homes to this area of land, whilst meeting a national ask, doesn't take into account the already horrendous parking and general traffic conditions extant in the area. Taking the average number of vehicles per household being 2 per household, the plan seeks to add a further 228 vehicles into an already highly congested road. This is at the end of the development process. The traffic and parking issues during development of the	The modification would be to remove this site as an option for development and then to revise the plan to include the addition of further schools and medical facilities to cater for the increased population. Scrub Lane as a road cannot accommodate any more traffic than it already has to contend with, which also raises questions on the viability written into the plan identifying Scrub Lane as ripe for addition of a cycle lane - the road is just not big enough to cope!	Yes	Not Answered	Not Answered	A	Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character Infrastructure Air quality	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.	N

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											site in question, with the additional heavy machinery and heavy vehicles required, will not only destroy the road and pavement surfaces, but render the route impassable for long periods congesting surrounding roads. This also doesn't take into account any works/incidents that frequently take place along the A13 which leads to Scrub Lane becoming a cut through and exacerbating traffic problems. Furthermore, there isn't the capacity at the local Infant and Junior schools, let alone Dentists and GP surgeries, to accommodate the additional need that 114 extra homes will require. The infrastructure and locale of each school (Infants and Juniors) means it is next to impossible to build the additional classrooms that would be required. This leaves the final issue I have with this part of the plan, and that is the effect on the air quality right next to an Infant and Nursery school. The amount of pollution produced by construction vehicles right next to the school, with children playing outside at frequent points in the day, is an intolerable idea and causes														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. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Air Quality Air quality impacts are assessed in the Sustainability Appraisal, under	

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											a long-term threat to the children's health!							objective 9.1. Annual Status Reports for Castle Point can be found on the Essex Air website along with further information relating to air quality within Castle Point. Castle Point monitor nitrogen dioxide using diffusion tubes at 30 monitoring locations around the district. The main source of pollution in the Borough is road traffic emissions from major roads, notably the A13, A127 and A130. The Council has not declared any Air Quality Management Areas (AQMAs). Generally, air pollution is low in Castle Point. Results from the monitoring points across the Borough suggest that air quality is improving.	

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0943-0001	Individual	Alfie	Fennings		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0944-0001	Individual	Sharon	Playle		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0945-0001	Individual	George	Fennings		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0988-0011	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	C9	No		No	Positively prepared, Effective, Justified, Consistent with national policy	2.27. Allocation C9 Land at the Point, Canvey Island would see the re-development of employment land. The policy states that it would secure re-provision of employment at West Canvey. However, Allocation C4 West Canvey states it would secure a modest increase in commercial provision to support economic growth. The policy does not acknowledge or support the re-provision or relocation of existing employment that would be lost at C9. 2.28. In addition, C9 would be a large and complicated site, with proposals to deliver both housing and employment on the same						Objecting to the loss of employment land at C9 Complicated site for delivery due to mixed use and would require a master developer	Policy C9 requires a masterplan in order to ensure comprehensive development is achieved. As detailed in the policy re-provision at west canvey of any lost employment land is required. Policy C4 at canvey allows for atleast a 10% increase in employment land provision which would allow for this accomodation.	N

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											site – that already accommodates various uses. For effective delivery, a master developer would be required to ensure a clear vision is set from the outset, and then delivery in accordance with that vision is achieved. This does not seem to have been identified or considered by the Council.								
0988-0012	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	Thun2	No		No	Positively prepared, Effective, Justified, Consistent with national policy	2.29. Policy Thun2 Kiln Road comprises a significant re-development of a brownfield site which is currently home to USP College. Again, a strong and effective masterplan would be required to ensure that the current education provision is not affected, and duly improved, through re-development to deliver housing on the same site.						Objecting to THUN2 due to it needing a masterplan and not being able to replace the education provision on site	Policy THUN2 requires a master plan to be produced with a phasing plan to ensure that the education provision on or off site has a timely delivery.	N
0988-0013	Agent			Persimmon Homes Ltd c/o Pegasus Group	Yes	Thun3a	No		No	Positively prepared, Effective, Justified, Consistent with national policy	2.30. Policy Thun3A proposes replacement of Thundersley Clinic with housing. The new Plan and its evidence base continually highlights poor infrastructure capacity in Castle Point. The loss of this Clinic therefore needs to be justified.						The loss of this clinic needs to be justified	Policy THUN3 required the NHS to provide assurance that the site is surplus to requirements and that the services can be provided elsewhere nearby.	N

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0335-0001	Individual	Damien	Lynch	Planning Issues OBO Churchill Living and McCarthy Stone		HO U2		The draft policy sets out that all proposals for new residential development resulting in 10 or more net additional homes (or 0.5 hectares or more) will be required to deliver new affordable housing, as a proportion of the total gross housing with a minimum of 10% intermediate housing and a further 10% on brownfield sites (without ground floor commercial) or a further 20% social housing on greenfield sites. In so far as this policy would impact both McCarthy & Stone and Churchill Living, given that they deliver almost exclusively on brownfield land, the expectation is that they would be required to provide 20% affordable housing subject to viability. This is unless ground floor commercial is provided when the requirement would reduce to 10%. It is at this point; it is important to recognise The PPG on viability at Paragraph: 002 Reference ID: 10-002-20190509 which states: “The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are			Birmingham Due to the specific viability challenges of delivering older persons’ housing, the evidence suggests on the basis of the market research, appraisal inputs and policy requirements, Older Person’s Housing is exempted from Affordable Housing provision. Charnwood Our viability evidence shows that neither sheltered housing nor extra care housing developments are likely to be viable if a contribution towards affordable housing is sought. This was also the case in BCP and most recently in Hyndburn emerging local plan policies. In addition, Fareham Borough Council’s adopted local plan Policy HP5 states: The Viability Study concludes that affordable housing is not viable for older persons and specialist housing. Therefore, Policy HP5 does not apply to specialist housing or older persons housing. Both McCarthy Stone and Churchill Living are of the view that a similar stance should be taken by Castle Point in the knowledge that older persons housing does not have the capacity to	We recommend the following addition to emerging HOU2 to ensure the policy is justified, effective and is in accordance with national planning policy guidance: “The Viability Study concludes that affordable housing is not viable for older persons and specialist housing. Therefore, Policy HOU2 does not apply to specialist housing for older persons”.					Recommends the following addition to emerging HOU2 to ensure the policy is justified, effective and is in accordance with national planning policy guidance: “The Viability Study concludes that affordable housing is not viable for older persons and specialist housing. Therefore, Policy HOU2 does not apply to specialist housing for older persons”.	Address via an additional paragraph to Policy Hou2 as follows 6. Where these requirements cannot be met, a fully transparent viability assessment should be provided in line with Part 6 of policy SP4. The Council reserves the right to seek mitigation through the use of a late stage viability assessment linked to an overage clause within the S106 Agreement, in the event that viability improves prior to the completion of the development.	Y - Additional paragraph to Policy Hou2 as follows 6. Where these requirements cannot be met, a fully transparent viability assessment should be provided in line with Part 6 of policy SP4. The Council reserves the right to seek mitigation through the use of a late stage viability assessment

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		
								realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan’ and that ‘Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage”. When reviewing the Council’s recently published Viability Study (July 2025), it is clear that the older persons housing typology has been tested. The conclusions of this report are clearly set out within paragraph 6.10: The viability results for the tested older person accommodation by accommodation type and value area are summarised in Table 6.2. It is clear from these results that the older person accommodation would be unlikely to come forward under the emerging Castle Point Plan in the current market anywhere in Castle Point borough. Therefore, some flexibility in the emerging policies may be required, possibly by lowering the affordable housing rates for older person sites. Our			delivery affordable housing, as set out in the Viability Study. Council Members, Officers and the general public will assume that applications for sheltered or extra care housing will be able to support a policy compliant level of affordable housing. This would however be wholly at odds with the viability evidence underpinning the Local Plan were the assumptions made within the testing to accord with those agreed routinely on a site-specific level. Our extensive experience in dealing with site specific viability discussions is that it is never appropriate to apply generic affordable housing requirements as this leads to confusion, misled expectations and delay.										linked to an overage clause within the S106 Agreement, in the event that viability improves prior to the completion of the development.

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								experience of affordable housing provision elsewhere in the country is that its commonly agreed older persons' housing cannot provide full percentages of affordable housing or indeed often cannot provide for any affordable housing. The draft policy appears to ignore the recommendations of the Viability Study which would mean that the policy is not justified or in accordance with the NPPG. More and more local planning authorities are acknowledging the viability constraints of older person's housing within emerging and adopted local plans by way of exemptions. As industry leading specialists, we consider this approach to be proactive and necessary for enabling adequate delivery of this type of housing. This is particularly the case where Viability Tests show the model of older persons housing to not be viable, as is the case here. As an example, emerging policies in both Birmingham and Charnwood propose affordable housing exemptions in respect of proposals for housing for older people having found through their plan wide											

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								viability assessments that viability was constrained for these typologies. The proposed wording of each policy has been set out below:											
0335-0002	Individual	Damien	Lynch	Planning Issues OBO Churchill Living and McCarthy Stone		HOU3		This policy sets out a generic housing mix against which applications for residential proposals will be benchmarked. The Castle Point Housing Needs Assessment 2025 clearly sets out that the largest growing age cohort over the plan period will be amongst older households and that within this, couples without children or single people will see the largest increase in household types.			Our view is that policy HOU3 as drafted, fails to account for the fact that specific types of residential proposals, including housing for older people will simply not need to provide the mix of housing as set out. This is clearly the case based upon the council owns housing needs evidence base. The December 2023 housing needs assessment states the following: We would note that between 2023 and 2043 the older person population of Castle Point is projected to grow by 3,527persons aged 75 years or more. As of 2023, there were 12,291 persons aged 75 years or more in Castle Point and there were 561 units of dedicated older person	We recommend that the following text is added to the draft policy to ensure that the policy is sufficiently flexible and effective. “The needs of specialist housing typologies will differ from generic housing and will be assessed on a case by case basis in line with identified housing need”.					We recommend that the following text is added to the draft policy to ensure that the policy HOU3 is sufficiently flexible and effective. “The needs of specialist housing typologies will differ from generic housing and will be assessed on a case by case basis in line with identified housing need”.	Additional sentence Additional sentence to HOU3 proposed To ensure mixed and balanced communities, development will be required to reflect a mix in line with the table above, as far as possible and as an initial benchmark. The needs of specialist housing typologies will differ from generic housing and will be assessed on a case by case basis in line	Y - Additional sentence to HOU3 proposed To ensure mixed and balanced communities, development will be required to reflect a mix in line with the table above,

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											accommodation in the area, almost all of which is in the form of sheltered housing. This means that there are around 46 units of older person housing for every 1,000 older persons in Castle Point aged over 75 years. This is one of the lowest figures of older person accommodation per capita ORS have seen. Statistics from the Elderly Accommodation Council show 139 per 1,000 across England, while the National average is 120 per thousand. The housing requirements for older people are therefore starting from a very low base and policy should acknowledge this and avoid creating obstacles to the delivery of much need housing for older people. The significant housing requirements for older people is set out within draft Policy HOU4 which supports the provision of at 1,056 sheltered housing homes and 594 extra care homes over the plan period. Paragraph 13.28 of the draft plan states: It is expected that older persons housing will predominantly be 1-2 bedroom units, which reflects older people’s housing needs, and will help to release larger												with identified housing need	as far as possible and as an initial benchmark. The needs of specialist housing typologies will differ from generic housing and will be assessed on a case by case basis in line with identified housing need.

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											existing houses to meet the needs of growing families. Further flexibility must therefore be allowed within draft Policy HOU3 to ensure that it is effective.								
0335-0003	Individual	Damien	Lynch	Planning Issues OBO Churchill Living and McCarthy Stone		Infra3	No	Draft policy Infra3 requires the submission of a Health Impact Assessment for planning applications for major development. The Council should note that there is a common misconception that older person's housing places an additional burden on healthcare infrastructure and therefore rather than requiring applicants of older person's schemes to show that there is capacity in healthcare systems and to show that the scheme will not have a health impact, the policy should instead recognise the health benefits that delivering older people's housing can bring to individuals. Older Persons' Housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that	No	Effective, Consistent with National Policy	A report “‘Healthier and Happier’ An analysis of the fiscal and wellbeing benefits of building more homes for later living” by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that: • ‘Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year. • Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year. •	For the plan to be in line with national policy and effective the following wording should be added to the policy to recognise the health benefits of older persons housing. “Specialist Housing for older people has a number of health benefits and proposals for such schemes will not be required to submit a Health Impact Assessment.” Clause f. ii should be deleted.					For the plan to be in line with national policy and effective the following wording should be added to the policy INFRA3 to recognise the health benefits of older persons housing.	Noted	N

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								many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources.			On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.’ In addition, specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptations such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder.								
0335-0004	Individual	Damien	Lynch	Planning Issues OBO Churchill Living and McCarthy Stone		Sustainable Development	No	The plan seeks to introduce a range of sustainable development measures including Net Zero Carbon Development (in operation and embodied carbon). Whilst Council’s commitment to meeting both its and the UK Government’s target of net zero carbon emissions is commendable, it appears that the Council is going to achieve this through having mandatory carbon and	No	Justified, Effective	This approach is confirmed within the Ministerial Statement (statement no : Statement UIN HCWS123 available from Written statements - Written questions, answers and statements - UK Parliament) released on 13th December 2023. The ministerial statement confirms that with respect to the net zero goal....“The improvement in standards already in force, alongside	We recommend that the following text is added to the draft policies SD4 and SD5 (Zero Carbon in operation and embodied carbon) to ensure it is justified and effective. “The council’s viability assessments of specialist housing typologies has shown that these developments have limited viability and therefore such proposals will not be subject to these requirements. Instead, these proposals will					“Specialist Housing for older people has a number of health benefits and proposals for such schemes will not be required to submit a Health Impact Assessment.”	Noted	N

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								climate standards from adoption of the plan that may go beyond government targets. However, it is our view that any requirement should be ‘stepped’ in line with Government targets and the proposed changes to the building regulations.			the ones which are due in 2025, demonstrates the Government’s commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale’ and ‘To be sound, local plans must be consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, including this one.” We note that the council has commissioned a further viability study	meet building regulation requirements in place at the time”.								

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											which looks at the impact of zero carbon policies and specifically examines sheltered housing. It concludes at 10.42 that: “We do note however that viability tends to be weaker in the lower value area and for certain types of scheme – flatted development, specialist older persons housing and single units, the latter 2 of which are only viable in the VA4. It is where some or all of these factors apply that the costs of meeting net zero carbon may mean that residential development becomes unviable when the additional costs are applied. This could mean that there may need to be an adjustment to land values to account for higher costs of development and/or a balance of policy considerations, unless other measures can be taken to improve viability.” We are therefore concerned that policies within this range have not shown to be viable for older persons housing development within either of the viability studies undertaken by the council. This is particularly worrying given the identified housing needs for this typology. There is a danger that the requirements of the plan are unviable and the								

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											policies are not sufficiently flexible.								
0323-0001	Organisation	Michael	Atkins	Port of London Authority		SP1						Suggested Modifications: - Undertake and publish a full audit of Council-owned residential land. - Introduce policies supporting sensitive densification and estate renewal. - Carry out a Garden Land Capacity Study and adopt criteria-based policies to manage appropriate redevelopment. Requested Modifications (a) Restate the supply tables, removing post-period units. (b) Replace the stepped trajectory with an annual, site-by-site profile including non-implementation discounts. (c) Remove holiday replacement units from the deliverable tally unless robust evidence is provided. (d) Publish a clear Affordable Housing delivery plan with monitoring triggers. (e) Audit Council-owned residential estates for early densification and include them in the trajectory. (f) Commission and publish a Garden Land				A	<u>Policy SP1, part 4 - supports Page 21 – Green Infrastructure Map:</u> It appears that the map key for this image requires updating to highlight all the green infrastructure designations shown on the map, some of which appear to be missing from the key. <u>Page 28 – Key Diagram:</u> Welcome recognition of Port Facilities on the key map with regard to the Canvey Port Facilities including Oikos and Calor Gas.	Supports noted Mods proposed in relation to Green Infrastructure Map (page 21), Policy C3, and supporting paragraphs 8.30 and 8.32. All policies in the Plan apply, so cross-references are generally not considered necessary.	Page 21 – Green Infrastructure Map: Map key for this image requires updating to highlight all the green infrastructure designations shown on the map, some of which appear to be missing from the key

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												Capacity Study to inform policy.							
0323-0002	Organisation	Michael	Atkins	Port of London Authority		C2											<u>Policy C2 - Canvey Seafront Entertainment Area:</u> Support the Councils intention to prepare a Master Plan for the Canvey Seafront Entertainment area. The PLA has previously been consulted on initial discussions and would wish to continue to be involved in the project as it progresses.	Noted	N
0323-0003	Organisation	Michael	Atkins	Port of London Authority		C3											<u>Policy C3 - Canvey Port Facilities:</u> In principle the PLA support the continued promotion of the boroughs port facilities at Canvey and it is welcomed that supporting paragraph 8.27 states recognises that The Calor Gas and Oikos terminals are	Mods proposed	8.27 There are two port facilities located adjacent to each other at south Canvey. These port facilities include the

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																	nationally significant and have a role to play in ensuring the security of energy supplies in the UK. In addition it is considered that there should be a link added to policy SD6 (Pollution Control) particularly with regard to the importance for SD6(3) that development proposals adjacent to, or in the vicinity of, existing businesses or community facilities will need to demonstrate that the ongoing use of the existing businesses or community facilities would not be prejudiced by the proposed development, in line with the Agent of Change included in paragraph 200 of the National Planning Policy Framework (NPPF) (2025). Note and support the reference (Paragraph 8.32) to the Southeast Inshore Marine		Calor Gas terminal located to the west of Thames Road for the importation and storage of liquefied petroleum gas and the Oikos terminal to the east of Haven Road, which receives and stores oil and a range of hydrocarbon products. Both terminals have close good deep-water accessible jetties with good

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																	Plan and the potential need for separate consents from the Marine Management Organisation (MMO). Alongside this there should be a reference to the Port of London Authority's River Works Licencing process, which also forms a requirement as part of any works in, on or over the Tidal Thames. Within paragraph 8.30 – the reference to the English Coast Path should be updated to state 'King Charles III England Coast Path'.		access to shipping lanes that are used to receive fuel imports by ship. These fuels are exported from the terminals by pipeline and by road tanker. The Calor Gas and Oikos terminals are nationally significant, well situated close to the mouth of the Thames estuary and gateway to the Port of London, and

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																			have a role to play in ensuring the security of energy supplies in the UK. 8.30 The port facilities occupy a substantial frontage of the waterfront at South Canvey. This limits access to a narrow strip of the waterfront in this location, creating an enclosing effect for users. This route, which is

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																			part of the English Coast King Charles III England Path, is not bicycle or equestrian friendly 8.32 It should be noted that as these facilities are adjacent to the coast, the South East Inshore Marine Plan is also relevant in respect of any development which affects the seaward side of

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																			the defence s. Consideration needs to be given to how any such changes impact on the marine environment or its use, including any conflicts arising with other users. Separate consent s from the Marine Management Organisation will be required for certain types of activity, and the Port of London Authorit

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																			y's River Works Licencing process also forms a requirement as part of any works in, on or over the Tidal Thames .
0323-0004	Organisation	Michael	Atkins	Port of London Authority		C5										A	<u>Policy C5 - Improved Access to and around Canvey Island:</u> The PLA should, where appropriate be consulted on any future proposals to deliver a third access route to/from Canvey as part of a forthcoming feasibility study, informing the first review of the Castle Point Plan to identify options for improving access to, from and within Canvey Island. As part of this welcome that paragraph 8.15 of the reasoned justification recognises the	Support noted.	N

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																	proximity of the Benfleet and Southend Marshes SPA and Ramsar site and the Thames Estuary and Marshes SPA and Ramsar site.		
0948	Duplicate Representation Received. See 0947-0001 to 0947-0010.																		

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0949-0001	Individual	Claire	Dumontier		Yes	HAD4	Yes	N/A	No	Consistent with national policy	We write to object to the proposed allocation of at least 114 dwellings on Land South of Scrub Lane (Policy HAD4) in the Draft Castle Point Plan (Regulation 19, 2025). I believe the proposal conflicts with national planning policy (NPPF, 2024), UK environmental legislation (Environment Act 2021), and Castle Point's own strategic and place-based policies. For the reasons set out below, the allocation should be refused or substantially modified. . Overdevelopment and Density Policy HAD4 allocates at least 114 homes on a site of approximately one hectare. This represents an excessively high density for a greenfield edge-of-settlement location. Castle Point Policy SP2 ("Making effective use of urban land and creating sustainable places") requires density targets to reflect the characteristics of different areas. The Scrub Lane site lies on the urban edge of Hadleigh, adjacent to open countryside, and such an intensive scheme would undermine local character. NPPF Paragraphs 119–120	Withdraw the proposed development o the green space south of scrub lane. Please see all above comments.	Yes	Not Answered	Not Answered	A	Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character Green Belt	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. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details. Green Belt This land is not	N

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											require efficient land use, but emphasise that development density must reflect the prevailing character and setting. This allocation does not respect those principles and risks creating cramped, poor-quality living environments. --- 2. Loss of Green Land and Environmental Value The site is presently open green land providing important ecosystem services — biodiversity, carbon sequestration, flood absorption, and landscape character. Castle Point Policy SP1 (“Supporting an enhancement of the Borough’s green spaces”) requires the protection and enhancement of green space. HAD4 would result in its permanent loss. NPPF Paragraphs 179–180 require policies and decisions to protect and enhance valued landscapes and biodiversity, to deliver net gains, and to maintain ecological networks. Under the Environment Act 2021, development must														allocated as Green Belt	

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											provide a minimum 10% Biodiversity Net Gain. With such intensive use, it is unclear how HAD4 could achieve this without substantial off-site measures. --- 3. Infrastructure Capacity Development of 114 dwellings would generate significant additional demand on local infrastructure, services, and utilities. Castle Point Policy SP4 (“Development contributions”) requires that new development must provide adequate contributions to education, healthcare, transport, and utilities. No clear mitigation strategy has been presented for HAD4. NPPF Chapter 8 requires planning decisions to ensure sufficient provision of community facilities and services. Schools, GP surgeries, and local roads in Hadleigh are already under pressure and risk being overburdened.								

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											--- 4. Flood Risk and Drainage Castle Point is particularly vulnerable to flood risk, and development on greenfield sites can exacerbate surface water flooding. NPPF Paragraphs 167–169 (Chapter 14) require development to be directed away from areas at highest flood risk, and to provide robust mitigation including sustainable drainage systems (SUDS). The Castle Point Plan’s policies on climate resilience (SD1–SD3) similarly require comprehensive flood mitigation and sustainable drainage. HAD4 does not provide adequate assurances in this respect. --- 5. Design Quality and Local Character High-quality design is a core principle of sustainable development. The Castle Point Residential Design Guidance (2013) requires adequate space standards, privacy, amenity								

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											space, landscaping, and parking provision. A scheme of 114 dwellings on this site is unlikely to comply with these requirements. NPPF Paragraph 130 (Chapter 12 – Achieving Well-Designed Places) requires that developments: function well and add to the quality of the area; are sympathetic to local character and landscape setting; provide attractive layouts with adequate landscaping; and establish a strong sense of place. The HAD4 allocation, at its proposed density, would fail to achieve these objectives. --- 6. Green Belt / Countryside Considerations If the site falls within, or adjacent to, Green Belt designation: NPPF Paragraphs 142–160								

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											confirm that Green Belt boundaries should be altered only in exceptional circumstances. Protecting openness and preventing urban sprawl are fundamental. The HAD4 allocation does not demonstrate exceptional justification. Even if not formally designated, the site contributes to the openness and character of Hadleigh’s edge and should be safeguarded. --- 7. Legal and Policy Inconsistencies The allocation conflicts with Castle Point Strategic Policies SP1, SP2, and SP4, as well as HAD4’s own requirement to deliver sustainable and context-appropriate growth. It conflicts with the NPPF (2024) requirements in Chapters 11, 12, 14, and 15. It may fail to comply with the Environment Act 2021 requirement for Biodiversity Net Gain.									

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											--- Conclusion Policy HAD4 – Land South of Scrub Lane is unsound because: It represents overdevelopment of a sensitive greenfield edge-of-settlement site. It causes the irreversible loss of valued green land, contrary to Castle Point and national policy. It places unsustainable pressure on local infrastructure and services. It lacks robust provision for flood risk mitigation, biodiversity, and green infrastructure. It fails the tests of soundness set out in the NPPF (positively prepared, justified, effective, consistent with national policy). For these reasons, I respectfully urge Castle Point Borough Council to remove or substantially amend Policy HAD4 from the Draft Plan.								

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0950-0001	Individual	John	Driscoll		Yes	Whole Plan	Yes		Yes	Positively prepared, Effective, Justified	The plan is in keeping with what the local area needs and with the wishes of the vast majority of the residents of the borough.	No modifications required	Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0951-0001	Individual	Margaret	England		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, 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. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a	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, Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered	A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	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	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						
											significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put’s the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it’s a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.													as a whole, to deliver this scale of growth in 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	

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																		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 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	

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																		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 land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. 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.	

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																		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. 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,	

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																		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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																		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. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	

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0952-0001	Individual	John	England		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, 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. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not	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, Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered	A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	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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											suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.														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 Standard method. However, once a	

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																		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. Green Belt/Grey belt is addressed under policy GB2. Where our Green	

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																		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. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	
0953-0001	Individual	John	Bryce		Yes	HAD4	No	The draft document leaves far too many relevant and significant points underdeveloped and inconclusive which legally should be resolved prior to seeking of approval e.g the provision of alternative sporting facilities where there is only a vague and indeterminate availability of additional funds and a reference to there being	No	Positively prepared, Effective, Justified	There are too many vagaries and incomplete explanations on the solutions to the relevant problems arising from this development e.g., parking of the additional vehicles which will be brought to site by new homeowners ; enhanced safety requirements for children attending the school; full consultation on the loss of	Please see some of my principal concerns in 3c . These are not matters to be dealt with by " any revised wording ".	No	Not Answered	Not Answered		Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character Lack of provision of alternative sporting facilities	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	N

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								further discussions with the Council on alternative facilities without naming these there being no indication that such facilities with the requisite spare or additional capacity to cater for the usage now being removed from the site HAD4 Land South of Scrub Lane .			sporting facilities both for the general public and the school; enhanced child safety and protection arising from the increased presence of unknown adults; discussion on the ability and capacity of the affected schools to cope with the influx of additional children across the full age spectrum The foregoing list is not exhaustive. This was a poor effort and demands abandonment of the proposal altogether given the large number of relevant aspects which have been left unaddressed and /or poorly dealt with.							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. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details. Loss of sporting facilities Policy HAD4 requires that the loss of the playing field is mitigated by an appropriate financial contribution towards new or enhances playing field facilities nearby.	

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0954-0001	Individual	Val	Hammond		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, 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, 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, the Canvey West homes puts residents in the East at risk with emergency evacuation procedures, and this over development policy for Canvey will affect highways and traffic, the lack of infrastructure, sewage and poor drainage system on Canvey, and enhance the flood risks to Canvey Lake. I do agree with Policy C7 about improving the Canvey	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	Not Answered	Not Answered	A	North West thundersley No five year housing land supply Not meeting housing target Green/Grey Belt Flood risk on canvey Infrastructure Support for Policy C7	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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											Lake. This needs to deliver an increased capacity of the Lake from dredging for flood water storage, reduce the flood risk, a long-term management plan of the lake, improve and maintain water quality, enhancements to the habitat surrounding the lake, an environment to create an attractive and functional area, and also identified as an area of particular importance for biodiversity within the Essex Local Nature Recovery Strategy. I concur with the many statements made within this policy, that Canvey Island suffers from high levels of surface water flood risk, and with higher rainfall Canvey Lake becomes an important depository for excess rainwater, poor water quality is unsafe for users, animals and biodiversity to thrive, we need to further improve this natural environment, and how surface water runoff contaminates should be managed, the Canvey Island 6 Point Plan was undertaken in 2015, about Canvey and recommended the capacity of the lake should be investigated and achieved through to provide additional storage capacity, and that Canvey Lake acts														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 Standard method. However, once a	

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											as a habitat to many different wildlife, including waterbirds and some aquatic life with the risks to wildlife due to the water quality. This is the vision we need for Canvey Lake.							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 years of the plan the Council's aim is to deliver	

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																		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. Green Belt/Grey belt is addressed under policy GB2. Where our Green	

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																		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. Flood Risk 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.	

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																		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. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Support for policy C7 noted.	
0955-0001	Individual	Tom	Cushion		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N

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0956-0001	Individual	Lucy	Garwood		Yes	HA D4	Yes		No	Positively prepared, Effective	The plan to put 114 new homes on this site south of Scrub lane, would be unnecessary over-development of the area. With little to no thought about the impact the extra traffic and vehicle parking would place on the already strained road network in the area.	There would be less objection to a significantly lower volume of housing in that area 10-20 new homes, that would not result in the lose of an outdoor space used by the locals. This lower volume of housing would also not cause a severe strain on the local roads.	No	Not Answered	Not Answered		Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character 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. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.	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.	N
0957-	Individual	Ben	Feld		Yes	Whole	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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0001						Plan							swere d	wer ed	were d				
0323-0005	Organisation	Michael	Atkins	Port of London Authority		C6											Policy C6 - The South Canvey Green Lung: In principle support the intention of the policy, with regard to the potential for renewable energy provision within the South Canvey Green Lung where it can be demonstrated that a high level of biodiversity net gain can be secured and there will be no adverse impact on the integrity of nearby Habitats Sites.	Support noted.	N
0323-0006	Organisation	Michael	Atkins	Port of London Authority		C9											Policy C9 – Land at the Point, Canvey Island: Support the reference on the need to ensure access to smallgains marina is maintained for water-based recreation as part of any future development at this location.	Support noted.	N

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0323-0007	Organisation	Michael	Atkins	Port of London Authority		D4											Policy D4 – Landscaping: As part of the reasoned justification (16.48) with regard to the public realm, it is considered that there must be appropriate wording included on the vital need for future waterside developments to provide appropriate riparian life saving equipment (such as grab chains, access ladders and life buoys) alongside riverside areas as recommended by the PLA's 'A safer Riverside Guidance' for development on and alongside the Tidal Thames (A Safer Riverside Port of London Authority). The PLA also considers that there is need for suicide prevention measures in appropriate locations (such as CCTV and signage with information to access support) to be provided as part of new development along	Mods proposed	New para after 16.48 Waterside developments should provide appropriate riparian life-saving and safety equipment) as recommended by the Port of London Authority 'A Safer Riverside Guidance' and the 'Drowning Prevention Strategy' (2019) produced by the Tidal Thames Water

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																	the riverside. This is supported by the Drowning Prevention Strategy (2019) (https://www.pla.co.uk/Safety/Water-Safety/Water-Safety) produced by the Tidal Thames Water Safety Forum, which comprises a number of agencies including the PLA, RNLI and emergency services.		Safety Forum.
0323-0008	Organisation	Michael	Atkins	Port of London Authority		ENV 2										A	<u>Policy ENV2 – Coastal & Riverside Strategy:</u> To confirm the PLA must also be included as part of the councils proposal to prepare a Riverside Strategy for the borough. Related to this consideration should also be given as to whether the policy should include reference to the Estuary Edges guidance which presents a ‘how to’ guide for developers on ecological design for softening these ‘edges’ to encourage wildlife into urban	Mods proposed	Policy ENV2 – Coastal & Riverside Strategy 1. Working with the Environment Agency, ECC Lead Local Flood Authority, neighbouring authorities, the community, the Port of

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																	estuaries. (About - Estuary Edges - The Thames Estuary Partnership).		London Authority and other relevant stakeholders the Council will prepare a Riverside Strategy .
0323-0009	Organisation	Michael	Atkins	Port of London Authority		T6										A	Promoting Sustainable Transport: Within this section it is considered that there must be a reference on the need to maximise the use of the Tidal Thames for both passengers and freight, including for the transportation of construction materials to, and waste from a development either directly to/from a site or through the supply chain. This would align with the Local Plan objectives to Secure the delivery of net zero development and secure the transport	Mods proposed Support for T6 noted.	<u>Policy T1 - Transport Strategy - New paragraph</u> 9. Supporting the use of the Tidal Thames for both passengers and freight <u>New supporting text paragraph</u> 20.31 Support

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																	infrastructure needed to support growth and is supported by the PLAs Thames Vision, which includes the aims to see more goods and materials routinely moved on the river, and to see a Thames that is more accessible to all. (Thames Vision 2050 Port of London Authority) Policy T6 - Safe Access: Support in principle the aim to ensure that development proposals offer safe access either directly or via appropriate mitigation, including safe access to the site for cyclists and footway provision for pedestrians. This is particularly important for coastal paths, and the access' to/from them, to ensure these are well lit and welcoming for all users.		ing the use of the Tidal Thames for both passengers and freight aligns with wider objectives to secure the transport infrastructure needed to support growth, to secure the delivery of net zero development and for a River Thames that is more accessible to be enjoyed by all.

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0323-0010	Organisation	Michael	Atkins	Port of London Authority		SD1										A	Policy SD1 - Tidal Flood Risk Management: It is important to note as part of this policy and its reasoned justification, that the policy approach to managing flood risk must take full account of the current and future operational requirements of the nationally significant Canvey port facilities.	Policy SD1: It is taken as a given that the provisions of other policies, including C3 'Canvey Port Facilities', apply across the plan and all policies must be considered in unison.	N

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0959-0001	Individual	Sophie	England		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, 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. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not	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, Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered	A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	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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											suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.														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 Standard method. However, once a	

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																		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 years of the plan the Council's aim is to deliver	

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																		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. 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	

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																		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. 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.	

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																		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. Green Belt/Grey belt is addressed under policy GB2. Where our Green	

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																		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. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	

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0959-0002	Individual	Sophie	England		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Effective, 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 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	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, Hadleigh at 305. Total housing target of 11,000.	No	Not Answered		A	Overdevelopment of brownfield sites North West Thundersley	Density The density for sites allocated within the plan has been informed by the Density and Capacity Study July 2025, please see this for further details. 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	N

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											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.							Thundersley was not preferred.	
0960-0001	Individual	Richard	Davies		Yes	HA D4	Yes		No		The proposed development of this vast number of homes will add to an area that is already highly populated, increasing traffic in an already busy area. There also aren't the school places/doctors etc to support this, It will place too much pressure on an already busy area.	It will need to take into account the increase amount of traffic and pressure on public services.	Not Answered	Not Answered	Not Answered	A	Objecting to Had4 due to: Traffic 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. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting	N

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																		Infrastructure Delivery Plan (IDP).	
0961-0001	Individual	Dina	Mehdi		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley Doesn't fulfil government's housing requirements.	No	Justified, Consistent with national policy	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 agree with the policy for the Had2 area. If the plan is unsound, then Hadleigh Green belt is at risk from speculative developers.	Add North West Thundersley site 187 hectares as a Green belt/Grey belt/Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200 with Canvey at 1050 and Hadleigh at 305. Total housing target of 11000.	No	Not Answered	Not Answered	A	Not meeting housing target No five year housing land supply North West Thundersley Supports HAD2	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	N

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																		NPPF when read as a whole, to deliver this scale of growth in 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	

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																		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 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	

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																		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 land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. 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	

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																		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. Support for HAD2 Noted.	

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0962-0001	Individual	Kevin	Ford		Yes	SP3	No	Failed to consider strategic alternatives like North-West Thundersley. No credible five 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 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 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 the residents in the East 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 11,000.	No	Not Answered	Not Answered	A	North West thundersley No five year housing land supply Not meeting housing target Green/Grey Belt Flood risk on canvey Infrastructure	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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																		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 years of the plan the Council's aim is to deliver	

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																		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. 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	

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																		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. 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.	

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																		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. Green Belt/Grey belt is addressed under policy GB2. Where our Green	

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																		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. Flood Risk 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.	

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																		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. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	

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0963-0001	Individual	Clive	Ellis		Yes	SP3	No	The council have failed to give fair consideration to strategic opportunities of the use of grey belt sites on the mainland in Benfleet / Thundersley under the NPPF Guide lines totally ignored the required numbers issued by the housing minister.	No	Positively prepared, Justified, Consistent with national policy	The NPPF clearly states that grey belt should be considered as part of the plan development to achieve the number of houses required, no true consideration of respecting these numbers requested have been considered as only just over half have been achieved The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. . The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt political stand point". 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 procedure no further development of Canvey Island should take	We should aim for at least 70% of the required housing numbers as set out. a 3rd road scheme must be put in place for the Canvey's further development to absorb the additional 20 - 30% in the final years of this plan this gives time to act on the roads and infrastructure of Canvey enabling it to cope in the later part of the plan .	No	Not Answered	Not Answered	A	North West thundersley No five year housing land supply Not meeting housing target Green/Grey Belt Flood risk on canvey Infrastructure Third road onto Canvey	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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											place until a 3rd access is completed.							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 Standard method. However, once a	

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																		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 years of the plan the Council's aim is to deliver	

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																		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. 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	

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																		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. 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.	

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																		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. Green Belt/Grey belt is addressed under policy GB2. Where our Green	

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																		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. Third Road onto Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements.	

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																		The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan. Infrastructure Infrastructure	

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																		matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
0964-0001	Individual	Reece	Bracci		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0323-0011	Organisation	Michael	Atkins	Port of London Authority		SD6											Policy SD6 – Pollution Control: Support part 3 of the policy which states that development proposals adjacent	Policy SD6: Support and points noted	N

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																	to, or in the vicinity of, existing businesses or community facilities will need to demonstrate that the ongoing use of the existing businesses or community facilities would not be prejudiced by the proposed development, and that the impact of the continuing operation of the existing businesses or community facilities on the amenity of occupiers of the new development can be satisfactorily mitigated through the development proposals. This is particularly relevant with regard to any potential future development located in proximity to Canvey's port facilities, and the need for these to be able to continue to operate over 24 hours a day as nationally importance facilities. To strengthen this policy further		

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																	specific reference should be given to the 'Agent of Change' principle that part 3 of the policy sets out.		
0966-0001	Individual	Matthew	England		Yes	HAD2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, 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. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the	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, Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered		Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	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	N

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											future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.														NPPF when read as a whole, to deliver this scale of growth in 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	

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																		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 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	

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																		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 land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. 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	

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																		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. 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	

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																		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 highway network and Evidence that parts of our Green Belt fulfil a strong Green	

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																		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 appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	

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0966-0002	Individual	Matthew	Engl and		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, 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 plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt	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, Hadleigh at 305. Total housing target of 11,000.	No	Not Answered			Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Flood risk on Canvey Overdevelopment of brownfield sites	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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											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. 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.							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 Standard method. However, once a	

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																		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. Green Belt/Grey belt is addressed under policy GB2. Where our Green	

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																		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. Flood risk 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.	

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																		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. Density The density for sites allocated within the plan has been informed by the Density and Capacity Study July 2025, please see this for further details.	
0966-0003	Individual	Matthew	England		Yes	HA D4	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, 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	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Revise Scrub Lane development to 20 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No	Not Answered			Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character	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	N

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											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 Had4 Policy is a perfect example of the over development urban policy, with an unrealistic proposal for 114 homes, using the Castle Point Density and Capacity Study, and a 100dph urban guide, in a residential area of housing currently having homes at 20dph. Housing on this site at 100dph would equate to six blocks of flats, four flats per floor, and four stories high, which is out of character for the area. The statement that the frontage of the development is designed to reflect the character of Scrub Lane, is a complete fabrication, as the houses opposite relates to approx. 15dph and it will never match the current street scene. The addition of 114 homes, and over 200 cars, would cause major issues at the Scrub Lane / Rectory Rod traffic lights.														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. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.	

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0967-0001	Individual	Kelly	Bullis		Yes	HAD2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, 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. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site, ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site, the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not	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, Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered	A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	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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											suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.														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 Standard method. However, once a	

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																		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. 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	

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																		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. 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.	

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																		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. Green Belt/Grey belt is addressed under policy GB2. Where our Green	

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																		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. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	

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0967-0002	Individual	Kelly	Bullis		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, 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 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	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, Hadleigh at 305. Total housing target of 11,000.	No	Not Answered		A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Flood risk on Canvey Overdevelopment of brownfield sites	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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											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. 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.							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 Standard method. However, once a	

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																		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 years of the plan the Council's aim is to deliver	

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																		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. 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	

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																		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. Green Belt/Grey belt is addressed under policy GB2. Where our Green	

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																		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. Flood risk 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.	

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																		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. Density The density for sites allocated within the plan has been informed by the Density and Capacity Study July 2025, please see this for further details.	

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0967-0003	Individual	Kelly	Bullis		Yes	HA D4	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, 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 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	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Revise Scrub Lane development to 20 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No	Not Answered		A	Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character 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. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.		N

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											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. 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. The Had4 Policy is a perfect example of the over development urban policy, with an unrealistic proposal for 114 homes, using the Castle Point Density and Capacity Study, and a 100dph urban guide, in a residential area of housing currently having homes at 20dph. Housing on this site at 100dph would equate to six blocks of flats, four flats per floor, and four stories high, which is out of character for the area. The statement that the frontage of the development is designed to reflect the character of Scrub Lane, is a complete fabrication, as the houses opposite relates to approx. 15dph and it will								

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											never match the current street scene. The addition of 114 homes, and over 200 cars, would cause major issues at the Scrub Lane / Rectory Rod traffic lights.								
0967-0004	Individual	Kelly	Bullis		Yes	C7	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, 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	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, Hadleigh at 305. Total housing target of 11,000. Dredge Canvey Lake !!	No	Not Answered		A	Support for Policy C7	Support noted.	N

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											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 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 poor drainage system on Canvey, and enhance the flood risks to Canvey Lake. 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. I do agree with Policy C7 about improving the Canvey Lake. This needs to deliver an increased capacity of the Lake from dredging for flood water storage, reduce the flood risk, a long-term										

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											management plan of the lake, improve and maintain water quality, enhancements to the habitat surrounding the lake, an environment to create an attractive and functional area, and also identified as an area of particular importance for biodiversity within the Essex Local Nature Recovery Strategy. I concur with the many statements made within this policy, that Canvey Island suffers from high levels of surface water flood risk, and with higher rainfall Canvey Lake becomes an important depository for excess rainwater, poor water quality is unsafe for users, animals and biodiversity to thrive, we need to further improve this natural environment, and how surface water runoff contaminates should be managed, the Canvey Island 6 Point Plan was undertaken in 2015, about Canvey and recommended the capacity of the lake should be investigated and achieved through to provide additional storage capacity, and that Canvey Lake acts as a habitat to many different wildlife, including waterbirds and some aquatic life with the risks to wildlife due to the water								

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											quality. This is the vision we need for Canvey Lake.								
0968-0001	Individual	Brooke	Vallance		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0969-0001	Individual	Alan	Tibbit		Yes	SP3	No	The whole plan is predetermined. Councillors before election stated in their manifesto documents that No Green Belt would be built on. That is predisposition and is allowed. However to then dismiss ALL Green Belt from the process of fairness and equity in discussion/debate, is not allowed and is predetermination. The Councillors have followed the predisposition they used to get elected and have unfairly, especially with regard to basically	No	Positively prepared, Effective, Justified, Consistent with national policy	The refusal to use Green belt under any circumstances to appease the few who elected the Councillors goes against all legal requirements, is predetermined by the majority Party PIP and supported by CIIP. On this predetermination alone all of the requirements of producing a fair and equitable Local Plan have been broken.	1. The removal of use of land designated as future industrial expansion land as on Canvey West C4 2. The addition of the North West Thundersley site 3. The addition of land at Kings Park HO31, which has been removed from previously prepared Plans due to proven Councillor preference, even though it has been surveyed in November 2021 and found to be sound for development, with the additional Site Owner agreeing to build under a s106 agreement , a Doctors	Yes	Not Answered	Not Answered	A	Flood risk on canvey Evacuation Infrastructure North west thundersley Addition of HO31 - Kings Park Removal of Policy C4	Flood Risk 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,	N

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								dumping 3000+ homes on Canvey West industrial use sites, ignored all flood plain warnings, danger regarding evacuation of residents, for any reason from the Island, and overdevelopment on infrastructure deemed full, as far back as 2014 to protect Mainland Green Belt, especially with regard to North West Thundersley, which despite comments from CPBC stating it was not considered for one reason only, which was ECC refusal to update and provide access. This is in fact a complete fabrication to support their rhetoric, and now proven by numerous documents, not included in this Local Plan consultation, but unearthed by diligent research. It shows clearly this is not in fact true, as ECC state categorically they will work with any developer on any site to improve/create access by joint negotiations with any developer. To do that however the Land in question has to be submitted as useful development land and plans submitted. The Council and Councillors were aware of this but chose to ignore this site which is a mixture of				Surgery as part of the development.							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. Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/ Infrastructure Infrastructure matters (including healthcare and education) are	

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								Green/Grey Belt and industrial use land, which has none of the problems that the Canvey West proposals have.										covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). North West	
0970-0001	Individual	Stephen	Mountford		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0971-0001	Individual	Sally	Mountford		Yes	Whole Plan	Yes		Yes	Justified			Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0972-0001	Individual	Lisa	COPSEY		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0973-0001	Individual	Michael	Fuller		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0974-0001	Individual	Philip	Stepney		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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0974-0002	Not Answered	Philip	Stepney		Not Answered	Whole Plan	Yes		Yes				Not Answered	Not Answered		A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0975-0001	Agent	Daniel	Rapson	Privo Land Limited c/o Ceres Property	Yes	Foreword	No		No	Positively prepared, Effective, Justified, Consistent with national policy	1.1 These representations on the Castle Point Local Plan 2026-2043 Regulation 19 Draft ('the Draft Local Plan' or 'DLP') are made on behalf of Privo (The Chase) Limited "Privo". 1.2 Privo is promoting Land at and to the rear of 82 The Chase, Thundersley ('the Site') for a residential development of c.95 new homes. 1.3 Although the Site is designated as Green Belt, it aligns with the definition of 'grey belt' as outlined in the National Planning Policy Framework (NPPF). It is considered suitable, available, and deliverable for residential development and could make a meaningful contribution to addressing the Borough's significant shortfall in both market and affordable housing. Despite this, the Site is not proposed for residential allocation in the Draft Local Plan (DLP). 1.4 The Site forms part of a wider parcel referred to as GB12 within the DLP and the evidence base. The site was previously proposed to be allocated as part of a wider site allocation in the	Please see attached	Yes	Not Answered	Yes	A	Considers the plan to be unsound due to concerns regarding - not meeting the minimum housing requirement - flood risk assessment - deliverability of homes proposed - the SA - Duty to cooperate	Comments noted and response provided to specific policy comments	N

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											withdrawn Local Plan (wLP) as policy HO20 'The Chase, Thundersley. 1.5 In its current form, the DLP is considered fundamentally unsound when assessed against the soundness tests set out in the NPPF (paragraph 36). 1.6 The DLP's failure to even attempt to meet the minimum housing requirement, as required by the NPPF, places it in direct conflict with national policy. This is arguably its most obvious and serious flaw. 1.7 Beyond this, there are numerous additional concerns regarding the DLP's soundness. These include its inadequate approach to flood risk assessment and doubts over the deliverability of the limited number of new homes it does propose. 1.8 We also have concerns regarding legal compliance, particularly in relation to the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations') and the accompanying Sustainability Appraisal (SA). 1.9 Furthermore, we question whether the Duty to Cooperate has been properly fulfilled in the preparation of the DLP.								

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											1.10 This representation is structured as follows: Section 2 considers the DLP and the Duty to Cooperate Section 3 sets out concerns in relation to the DLP in terms of its compliance with the SEA Regulations. Section 4 considers Policy SP3 (Meeting Development Needs), and why it is considered unsound Section 5 discusses the site selection process, and in particular its approach to Green Belt sites and, specifically, the Site.								
0975-0002	Agent	Daniel	Rapson	Privateland Limited c/o Ceres Property	Yes	DTC	No		No	Positively prepared, Effective, Justified, Consistent with national policy	2.1 The Duty to Cooperate is a statutory obligation placed on local planning authorities, county councils, and certain public bodies in England under the Localism Act 2011 and the Planning and Compulsory Purchase Act 2004. It requires these bodies to engage constructively, actively, and on an ongoing basis to ensure the effective preparation of Local Plans, particularly in addressing strategic matters that cross administrative boundaries. 2.2 Key requirements of the duty to cooperate in relation to Local Plans include: • Engaging with neighbouring and relevant authorities early and throughout the plan-making process on strategic matters that cross	2.4 Castle Point Borough is not an isolated borough, and it should be recognised that it is part of a wider housing market area that includes the administrative areas of Basildon, Rochford, Southend-on-Sea and Thurrock. This geographical context is particularly relevant to the Duty to Cooperate, especially given that the Draft Local Plan (DLP) acknowledges it cannot fully meet the Borough's housing needs. It is clear from Policy SP3 that the DLP will fall pitifully short of meeting minimum housing needs in the early years of the plan in particular – less than a third of its minimum requirement. Given this, we would have expected to see clear evidence that the Council has engaged positively,	Not Answered	Not Answered	Yes	A	Lack of evidence of Duty to Cooperate - especially needed since not meeting housing need.	Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. The Council has worked collaboratively with all to ensure that the Duty to Cooperate has been met.	N

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											administrative boundaries. • Demonstrating effective joint working, which may involve joint evidence gathering, assessment, and policy development to address shared issues like housing, infrastructure, transport, and environmental impacts. • Considering formal arrangements such as joint plans, agreements, or joint committees for strategic planning where appropriate. • Providing robust evidence of cooperation efforts, including who was engaged, the nature and timing of cooperation, and how it influenced the Local Plan. This evidence is critical for the examination of the Local Plan. • Local Plans must reflect strategic priorities, including unmet needs from neighbouring authorities where reasonable and consistent with sustainable development. 2.3 Whilst the Duty to Cooperate is not a duty to agree, Authorities should make every effort to cooperate. 2.5 There is reference in the Castle Point Borough Council Housing Capacity Topic Paper (August 2025) to discussions having taken place under the Duty to Cooperate with	proactively, with its neighbours within the housing market area to seek to determine how the level of need the DLP fails to meet could be provided elsewhere, even if not in full. It is unfortunate that there appears to be no compelling evidence of any engagement having been carried out, both within the evidence base that backs the DLP or within the DLP itself.							

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											neighbouring authorities. However, no details are provided as to the nature of such discussions, outcomes, etc. Furthermore, the reference relates only to neighbouring authorities' views obtained July-September 2024 on the Council's Local Housing Needs Assessment, prepared in 2023 – pre 2024 NPPF. This is now work that needs to be fundamentally reconsidered in light of the updated NPPF (December 2024) and revised PPG, and the approach Councils are now required to address the housing crisis. 2.6 It is clear that significant further work is required by the Council in order for it to be able to demonstrate that it has carried out the Duty to Cooperate positively and proactively.								

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0975-0003	Agent	Daniel	Rapson	Privat Land Limited c/o Ceres Property	Yes	SP3	No		No	Positively prepared, Effective, Justified, Consistent with national policy	4.1 Policy SP3 is fundamentally unsound. It is unjustified, fails to ensure the DLP is positively prepared, clearly contrary to national policy, and substantial concerns with its effectiveness. The reasons for this are set out below. Amount 4.2 Policy SP3 of the Draft Local Plan (DLP) proposes the delivery of 6,196 homes between 2026 and 2043, equating to an average of 364 dwellings per annum (dpa). This is despite the DLP acknowledging at paragraph 6.52 that the housing requirement for this period is 11,662 dwellings—based on the standard method for calculating local housing need as set out in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). Notably, the DLP appears to overlook that this figure represents a minimum requirement under national policy. 4.3 Even if the DLP were to deliver all the homes it claims it will (a proposition that is subject to significant doubt, as discussed later in this representation), this would still result in a shortfall of 5,466 dwellings. In effect, the DLP seeks to deliver just 53% of the		Not Answered	Not Answered	Yes	A	<u>Housing Supply</u> Suggests conflict with NPPF and PPG <u>Green Belt/Grey Belt</u> The substantial shortfall in housing provision proposed by the DLP is evidently a consequence of its refusal to amend the Borough's Green Belt boundaries. The DLP adopts an overly rigid, almost sacrosanct approach to the Green Belt, which is fundamentally at odds with national planning policy. In contrast, the NPPF makes clear that Green Belt boundaries can be altered through the Local Plan process where justified by exceptional circumstances, such as meeting identified housing needs. Highlights changes to NPPF Green/Grey Belt classification.. <u>Timescales for Delivery</u> In addition to concerns regarding the overall	<u>Housing Supply – Government Housing Target and Standard method</u> 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 Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.	See Schedule of Modifications re: flooding

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											minimum housing requirement set out in the NPPF. There is no evidence of robust arrangements to ensure that the Borough's residual housing need will be met elsewhere within the wider housing market area. 4.4 This approach is clearly inconsistent with the NPPF. More importantly, it contradicts a core aspect of national policy that the Government has identified as critical for Local Planning Authorities to address in tackling the national housing crisis. 4.5 Even setting aside the DLP's direct conflict with the NPPF and PPG, the social and economic consequences of failing to meet housing needs are severe, as outlined in Section 3 of this representation. However, these impacts do not appear to have been given appropriate weight in determining the number of homes to be delivered. 4.6 Section 3 of this representation also sets out concerns regarding Policy SP3 in the context of the Sustainability Appraisal (SA) and the SEA Regulations. These concerns directly affect the soundness of the DLP, particularly in relation to the requirement for Local Plans to be justified. The SA					quantum of housing proposed, there are also significant issues with the timing of delivery set out in Policy SP3. Not only will the DLP fail to address local housing needs as per the NPPF, but the strategy will mean the shortage will be particularly acute in the first 10 years of the plan period. <u>Densities</u> The DLP suggests the proposed approach will require a density of 150 dph – an extremely high density compared to existing development within the Borough, and one that will necessitate flattened development. There is a lack of evidence to substantiate if it is even feasible for a development of this nature could be delivered whilst also providing for a variety of house types as needed and / or meeting the development management		Within the NPPF Paragraph 11 section b (a) and (ii) give an acknowledgement of circumstances in which national policy does not expect Standard Method outcomes to be met in full. <u>Housing Supply – 5 Year Supply and Timescales</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Densities</u> Policy Hou3 indicates the housing mix, including in Premium sustainability areas. <u>Flooding</u> Flood risk covered in policies and the supporting	

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											fails to provide a credible rationale for the DLP’s decision not to meet housing needs in full, relying instead on flawed reasoning that does not properly assess the implications of meeting versus failing to meet those needs. 4.7 The substantial shortfall in housing provision proposed by the DLP is evidently a consequence of its refusal to amend the Borough’s Green Belt boundaries. The DLP adopts an overly rigid, almost sacrosanct approach to the Green Belt, which is fundamentally at odds with national planning policy. In contrast, the NPPF makes clear that Green Belt boundaries can be altered through the Local Plan process where justified by exceptional circumstances, such as meeting identified housing needs. 4.8 It is worth noting that the Council previously prepared a Local Plan under the 2021 NPPF, which included limited Green Belt release and aimed to deliver 5,510 homes between 2018 and 2032—an average of 367 dpa. That plan was examined and found sound, subject to main modifications, but was ultimately withdrawn by the Council. The						standards the DLP proposes. <u>Flood Risk</u> The NPPF is clear that development should be directed away from areas at higher risk of flooding. Given that there are alternative sites within the Borough subject to lower flood risk—which have been rejected—the DLP’s approach in this regard is not justified. The DLP does not appear to be supported by a sequential test that could justify such an approach as the NPPF requires. Even if it could be shown to pass the sequential test, there is a lack of evidence to confirm development would be capable of passing the exceptions test for development in areas of flood risk. To rely so heavily on the delivery of such a development site, fundamental to the DLP’s proposed housing strategy, is	Strategic Flood Risk Assessment (SFRA). <u>Emergency Planning</u> 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 HSE. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	

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											withdrawn but sound Local Plan ('wLP') took a pragmatic approach to Green Belt alterations to meet housing needs, and was found to be consistent with national policy at the time—despite that policy being less permissive than the current NPPF, which the present DLP must adhere to. 4.9 In terms of changes to the NPPF and PPG since the wLP, three key aspects merit highlighting: Exceptional Circumstances and National Policy The NPPF now explicitly confirms that exceptional circumstances justifying alterations to Green Belt boundaries through the Local Plan process include, but are not limited to, situations where a Local Planning Authority is unable to meet its housing needs through other means. Grey Belt Classification The introduction of the 'grey belt' concept—referring to Green Belt land that does not strongly serve purposes (a), (b), or (d) of Green Belt designation—provides a clear basis for prioritising such land for release. These areas should be considered as part of any Green Belt review and released ahead of more sensitive greenfield Green Belt sites. Increased Housing						unjustified and alarming. <u>HSE Hazardous Installations Consultation Zone</u> The proposals appear to focus significant scale development in the HSE Hazardous Installations Consultation Zone. There are two Upper Tier COMAH (Control of Major Accident Hazard) sites located on Canvey Island. It is unclear if the HSE would consider West Canvey an appropriate location to which to direct significant scale housing growth.		

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											Requirement The minimum housing requirement for which the Borough needs to plan has increased substantially, strengthening the case that alterations to the Green Belt are necessary. 4.10 The Council’s Castle Point Green Belt Assessment (July 2025) identifies a number of potential grey belt sites within the Borough. The key point in relation to the soundness of Policy SP3 is that there are evidently Green Belt sites that do not strongly contribute to purposes (a), (b) or (d) of the Green Belt and could be utilised to reduce the need for housing. Even if development of such land would not meet needs in full, it could reduce the shortfall significantly compared to current proposals. 4.11 The Council’s Housing Capacity Topic Paper 2025 makes reference to Borough’s Green Belt being “heavily constrained...[but] even with potentially unconstrained areas, sustainable accessibility and infrastructure deliverability present significant barrier to development” (page 66). However, the DLP lacks any robust evidence to demonstrate that there are								

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											no Green Belt sites subject to such constraints that they cannot sustainably provide homes for the Borough. 4.12 For example, in seeking to justify the DLP's approach, and in respect of transport and sustainable access, the Council's Housing Capacity Topic Paper 2025 asserts at paragraph 12.9 that sites on the edge of settlements do not have access to services or public transport provision and that Green Belt sites promoted would not be developed at a density that would enable public transport services to be sustained. At 12.12 it goes on to conclude: "It is therefore appropriate and in accordance with the NPPF to avoid development in the Green Belt as it would not be sustainably located and would impact on traffic capacity on the local and strategic highway network. This is consistent with paragraphs 110 and 115 of the NPPF." 4.13 This conclusion is baseless and does not use common sense or logic and seems to suggest edge of settlement sites are rural, divorced from the settlement they are on the edge of, and therefore remote and isolated from services. Even if you were to								

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											disregard this assumption, or that sustainable transport is not limited to public transport, the conclusion fails to consider potential mitigation measures that might be required. In any case, the Council's own evidence does not support this position adopted by the Housing Capacity Topic Paper, the Green Belt Site Assessment (July 2025) suggests there are Green Belt sites that have been promoted that are capable of being considered suitable from a transport and accessibility perspective in that they are capable of complying with NPPF paragraphs 110 and 115. 4.14 Despite the Council expressing their concerns in terms of their ability to address the minimum housing requirement and prepare a plan that can be found sound, directly to the Secretary of State for MHCLG in April 2025, the response from the Secretary of State (30 June 2025) made clear that the Council is expected to quickly bring forward a Local Plan that can be found sound. Given this very clear response from the MHCLG, it is unclear why the Council has proceeded to consult on a								

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											DLP in its current form. Timescales for Delivery 4.15 In addition to concerns regarding the overall quantum of housing proposed, there are also significant issues with the timing of delivery set out in Policy SP3. Not only will the DLP fail to address local housing needs as per the NPPF, but the strategy will mean the shortage will be particularly acute in the first 10 years of the plan period. 4.16 Policy SP3 suggests that in the first five years of the plan period (2026-2031), the DLP will seek to provide for an average of 209 dpa (just 30% of its local housing need); rising to 253 dpa for the period 2031-2036 (37% of its local housing need); and then increasing significantly, although the figures are still substantially short of the 686 dpa minimum, to 554 dpa from 2031-2043. 4.17 The sequenced approach to delivery of housing growth set out in Policy SP3 is problematic for the following three reasons. 4.18 Firstly, there is an urgent need to redress the woeful supply of housing, nationally, immediately. Pushing the delivery of homes to a later date does not address the current chronic shortage, only								

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											exacerbating the shortfall, amplifying the socio-economic ripple effects of the crisis. 4.19 Secondly, the PPG is clear that if a housing trajectory is to be stepped, there should be clear justification for doing so. The strategy must also ensure housing needs are met in full in the plan period. In the DLP's case, neither criterion has been met. 4.20 Thirdly, the LHNA identifies that whilst the affordable housing need for the Borough over the plan period totals 3,976 dwellings, there are an estimated 3,220 households in the Borough currently living in unsuitable housing and are unable to afford their own housing, i.e. the vast majority of the community's affordable housing needs are an immediate need. The DLP failure to plan positively to deliver homes, including affordable housing, in the early part of the plan period in particular will have significant negative social repercussions for the Borough. Deliverability 4.21 Policy SP3 places significant reliance on redevelopment of urban sites on Canvey Island in								

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											order to achieve its proposed housing figure of 6,196 homes. 4.22 A total of 3,143 new homes—representing 51% of the Borough’s overall housing provision—are proposed to be delivered through this approach. Of these, 2,000 homes are allocated to the redevelopment of land at West Canvey (Policy C4). However, it is unclear whether this site is suitable, available, or achievable for residential development. As the DLP itself acknowledges, the land is currently occupied by employment uses and a retail park, with a diverse mix of active businesses. 4.23 The DLP suggests the proposed approach will require a density of 150 dph – an extremely high density compared to existing development within the Borough, and one that will necessitate flatted development. There is a lack of evidence to substantiate if it is even feasible for a development of this nature could be delivered whilst also providing for a variety of house types as needed and / or meeting the development management standards the DLP proposes. 4.24 Furthermore, the								

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											location is within Flood Zone 3 – land at greatest risk of flooding from tidal or fluvial sources. The NPPF is clear that development should be directed away from areas at higher risk of flooding. Given that there are alternative sites within the Borough subject to lower flood risk—which have been rejected—the DLP’s approach in this regard is not justified. The DLP does not appear to be supported by a sequential test that could justify such an approach as the NPPF requires. Even if it could be shown to pass the sequential test, there is a lack of evidence to confirm development would be capable of passing the exceptions test for development in areas of flood risk. To rely so heavily on the delivery of such a development site, fundamental to the DLP’s proposed housing strategy, is unjustified and alarming. 4.25 Furthermore, this area has some of the weakest connectivity and access to sustainable forms of transport relative to other parts of the Borough. It is particularly detached from the Borough’s railway station. 4.26 Finally, the proposals appear to focus significant scale development in the								

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											HSE Hazardous Installations Consultation Zone. There are two Upper Tier COMAH (Control of Major Accident Hazard) sites located on Canvey Island. It is unclear if the HSE would consider West Canvey an appropriate location to which to direct significant scale housing growth.								

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0975-0004	Agent	Daniel	Rapson	Privat Land Limited c/o Ceres Property	Yes	SP3	No		No	Positively prepared, Effective, Justified, Consistent with national policy	5.1 This section of our representation concerns the DLP's site selection process insofar as it concerns site GB12 / (Site ID40498) / Land at and to the rear of 82 The Chase, Thundersley ('the Site'). 5.2 The DLP does not allocate any Green Belt land for residential development. The evidence provided by the Council to justify this position is highly questionable, particularly given that the withdrawn Local Plan (wLP) was only recently examined and found sound on the basis that allocating multiple sites within the Green Belt was an appropriate and justified approach. 5.3 Consequently, the Borough's minimum housing requirement is significantly greater; and the NPPF and PPG are clear on both the need to amend Green Belt boundaries where housing needs cannot otherwise be met, and on the need to take a more permissive approach to considering the suitability of Green Belt land to be allocated for development. 5.4 In this context, the Council's position as set out in the DLP cannot be justified. Sustainability / Suitability 5.5 The Site adjoins the	5.33 It is grey belt land that should be prioritised for allocation through the new Local Plan.	Not Answered	Not Answered	Yes	A	Makes case for the inclusion of Site GB12 Land at and to the rear of 82 The Chase, Thundersley.	Noted	N

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											existing residential envelope of a settlement identified as sustainable to accommodate proportionate growth in the current Development Plan. It adjoins existing residential areas, to the north, south, partly east and west. Importantly, the site is situated within the Thundersley North and Thundersley South wards, very much within Thundersley. 5.6 The Site is not subject to any physical, environmental, or heritage constraints that suggest it would be unsuitable for residential development. The site does sit within a wider Local Wildlife Site (LoWS), which is not a statutory protection, but mitigation can address any adverse effects. Therefore, the Site’s only constraint to development is that it is located on land designated as Green Belt in the Development Plan dating back to 1998. This designation acts as a policy constraint—a limitation shared by the majority of land that could otherwise help meet the Borough’s needs. 5.7 On 2 October 2020 the wLP was submitted for examination. The Inspector concluded that with modifications the new								